

ENST Inspection Transmittal Summary Report

Media:
RCRA CONTRACTO

Inspection Type:
CEI

Inspection Date:
05/10/2017

NOV / NOPV / NOPF:

Yes

Inspector:
BAH CONTRACTOR BAH CONTRACTOR

Transmittal Date:
6/23/2017

Facility Name:
Raining Rose Inc.

Federal Facility:
No

CBI Claimed:

No

Address:
100 30th St Dr Se
Cedar Rapids
IA
52403

JUN 23 2017

ID Number:
IAR000521807

MM Participating Programs:

Facility Activity:
soap and detergent mfg

Compliance Officer:
BETH KOESTERER

ACS Code: **Potential EJ:**

MM Screening Complete? Yes

MM Screening Forwarded? Yes

If Yes, who? →

☐ ALL ☐ CAA ☒ E/RMP/T ☐ RCRA ☐ Wetlands
☐ CWA ☐ UST ☐ UIC ☐ PWS ☒ SPCC ☐ EJ

Selection Criteria 1:
Small Mfg Facility

Selection Criteria 2:
IA SQG

Inspection Findings:

1. Failure to keep satellite accumulation containers closed.
2. Failure to maintain adequate aisle space in hazardous waste accumulation area to allow for container management and emergency equipment use.
3. Failure to mark hazardous waste storage container with accumulation start date.

RCRA



563400

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

RAINING ROSE, INC

100 30TH St. Drive SE
Cedar Rapids, IA 52403
(319) 265-7167

EPA RCRA ID NO. IAR000521807

ON

May 10, 2017

BY

BOOZ ALLEN HAMILTON

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 7

ENVIRONMENTAL SCIENCES & TECHNOLOGY DIVISION

INTRODUCTION

At the request of the Environmental Sciences & Technology Division (ENST) and the Environmental Field Compliance Branch (EFCB) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) on May 10, 2017, at Raining Rose, Inc. (RR), located in Cedar Rapids, IA. The CEI was conducted under the authority of Section 3007(a) of RCRA, as amended. Booz Allen gathered information and data necessary for EPA to determine compliance with applicable regulatory and statutory requirements. During the CEI, it was discovered that RR currently generates greater than 100 kilograms (220 pounds) and less than 1,000 kilograms (2,200 pounds) of hazardous waste per calendar month, and accumulates less than 5,000 kilograms (11,000 pounds) of universal waste at any time. At these rates, RR is currently operating as a small quantity generator (SQG) of hazardous waste. The CEI was conducted as a Level B Multimedia Screening Inspection, and the *Region 7 Multimedia Screening Checklist* is included as Attachment 1.

RR has not previously been inspected.

PARTICIPANTS

The following persons participated in the CEI. Copies of the business cards obtained from the facility representatives during the CEI are included in Attachment 2.

Facility Representatives, RR:

Name	Title	E-mail/fax	Phone
Kyle Hach	Vice President of Operations	khach@rainingrose.com (319) 362-8139	(319) 297-3945
Mike Hicks	Logistics Manager	mhicks@rainingrose.com (319) 362-8139	(319) 265-7167
Desiree Hansen	Inventory Specialist	dhansen@rainingrose.com (319) 362-8139	(319) 265-7174
Mr. Lucas Claussen	Laboratory Technician	Email and fax numbers were not obtained	Phone number not obtained

EPA Representative, Booz Allen Hamilton:

Name	Title	E-mail/fax	Phone
Joshua A. Buehre	Associate	buehre_joshua@bah.com fax (816) 448-3801	(816) 448-3253

INSPECTION PROCEDURE

I arrived at RR at approximately 0800 hours to conduct the visual reconnaissance. I conducted the visual reconnaissance to identify and document potential areas of concern from the adjacent roadways. No environmental issues or areas of concern were observed during this preliminary examination.

At approximately 0810 hours, I entered the main entrance at RR and was met by a receptionist at the lobby desk. I identified myself to the receptionist, explained the purpose of the CEI, and asked to speak with the facility site contact, Mr. Hicks. The receptionist called Mr. Hicks on the telephone and explained that he had a visitor, the purpose of my visit and asked him to come to the lobby. Approximately 5 minutes later, I was greeted by Mr. Hicks, Mr. Hach and Ms. Hansen. After a brief introduction, Mr. Hach led us to a conference room where I conducted an entry briefing with Messrs. Hach and Hick, and Ms. Hansen.

During the entry briefing, I explained the purpose and the scope of the CEI to Messrs. Hach, Hicks and Ms. Hansen. I presented Messrs. Hach, Hicks and Ms. Hansen with my EPA credential letter and business card. I also presented a letter from the EPA Task Order Contracting Officer Representative (TOCOR), Mr. Ken Herstowski; and a business card from Mr. Gary Witkovski. I explained that while Mr. Herstowski is the TOCOR, any CEI responses to the EPA should be directed to Mr. Witkovski.

I presented Messrs. Hach, Hicks and Ms. Hansen with a copy of RCRA §3007(a) (stipulating hazardous waste inspection authority) and a copy of 42 U.S.C. 1001/1002 (requiring the provision of truthful and accurate information and documentation). These documents were read by them prior to continuing the CEI.

I then explained the EPA policy regarding the collection of confidential business information (CBI) to the Messrs. Hach, Hicks and Ms. Hansen. I stated that, at the conclusion of the CEI, they would be presented with the EPA *Confidentiality Notice*. At that time, a CBI claim could or could not be made for any or all of the information collected during the CEI.

The CEI consisted of a discussion of facility operations, waste generation, and waste management practices, a review of pertinent records, a visual inspection, and exit briefing. Messrs. Hach, Hicks and Ms. Hansen acted as the official facility representatives during the CEI and accompanied me during the visual inspection. I completed the CEI on May 10, 2017, and conducted an exit briefing with the Messrs. Hach, Hicks and Ms. Hansen (group).

Based upon the initial observations, **I issued a NOPF to RR at the conclusion of the CEI.**

During the exit briefing, Mr. Hicks acknowledged receipt of the following by his signature: a Confidentiality Notice (Attachment 3), which he read and signed indicating no confidential business information had been provided during the CEI, a Receipt for Documents and Samples (Attachment 4), and the NOPF (Attachment 5). Sixteen (16) photographs were taken during the CEI, fifteen (15) of which are included in Attachment 6.

FINDINGS AND OBSERVATIONS

Facility Operations

RR is a lip balm, lotion, sunscreen and hand sanitizer manufacturer located in the Northeast side of Cedar Rapids. RR's primary North American Industrial Classification System (NAICS) code is 325611 (Soap and Other Detergent Manufacturer).

The RR facility includes office, laboratory, production, packaging, warehouse, and shipping/receiving areas (approximately 100,000 square feet). The production area includes filling and batching areas which is immediately adjacent to the packaging area. Warehousing is between the packaging and receiving areas. The receiving/shipping area is located on the North end of the plant.

Hazardous wastes generated at the facility include isopropyl alcohol (IPA) (D001 characteristic), off specification or expired commercial chemical product (D001 characteristic; and U112, U188, U202 listed as applicable), waste flammable liquids (D001, D035 characteristic, and F003, F005 listed as applicable).

Nonhazardous wastes generated at the facility include general trash, scrap metal, waste oils (vegetable, sunflower and coconut), various expired product, and waste lamps (nonhazardous). Waste lamps are sent for recycling. Fluorescent lamps are replaced by personnel, stored in the

hazardous waste container accumulation area (HWCAA) and transported by Safety-Kleen Systems to their facility in Davenport, IA for recycling.

RR employs 200 full-time personnel and operates 24 hours each day, seven days each week. RR packaging personnel work an eight-hour shift on one of three shifts (0700-1500, 1500-2300, or 2300-0700 hours). Production personnel work one of two 12-hour shifts (0500-1700 or 1700-0500). Office personnel work 0800-1700, Monday – Friday.

Facility Status

The Hazardous Waste Site Info Verification Report for Inspector (Attachment 7) indicates that RR is registered with EPA, under EPA ID IAR000521807, as a SQG of hazardous waste. During the CEI, Ms. Hansen provided a copy of the hazardous waste manifest logs and universal waste manifest logs for waste generated from August 1, 2015 to present (Attachment 8).

RR did not register as a SQG until August of 2016. Prior to August of 2016, RR was operating as a conditionally exempt small quantity generator (CESQG). Since August 22, 2016 until present, RR is generating approximately 941 pounds of all hazardous waste, per month.

Therefore, I determined that RR is operating as a SQG of hazardous waste and inspected the facility as such.

Following the CEI, I amended the RCRA Hazardous Waste Site Info Verification Report for Inspector to reflect RR's current operations. Specifically, I updated the following: I added D035 characteristic waste code and F003, F005 and U188 listed waste codes to the Hazardous Waste Handles section.

Facility Waste Streams

A Waste Stream and Waste Handling Table for RR is presented below. The table describes the major waste streams generated on-site; waste management practices; and off-site treatment, storage, and disposal. A description of the major waste streams and management practices is also found in the *CEI Worksheets and Checklists* (Attachment 9).

Waste Stream and Waste Handling Table Raining Rose, Inc. – Cedar Rapids, IA					
Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
1) Isopropanol (IPA)	Cleaning process equipment	Hazardous (D001, by product/process knowledge)	Approximately 883 pounds per month (based on hazardous waste manifests)	Accumulated in 55-gallon hazardous waste accumulation container (HWAC); full containers transferred to main HWCAA.	Transported by Clean Harbors Environmental Services (Clean Harbors) to Safety-Kleen Systems (Smithfield, KY) for fuel blending
NOPF No. 3. See Visual Inspection section for associated findings, which includes failure to mark hazardous waste accumulation container with the accumulation start date.					
2) Soybean Oil mixed with IPA and Bee's Wax	Clean up of equipment from accidental contamination	Hazardous (D001) by product/process knowledge	One time cleanup that generated 19,200 pounds of waste in two shipments of waste on August 18, 2016.	None of this waste was on-site during the CEI. It is not anticipated that this waste stream will be generated again.	Transported by Clean Harbors to Safety-Kleen Systems for fuel blending
3) Off – Spec or Outdated Commercial Chemical Product	Expired product	Hazardous (D001, F003, F005, U112, U188, U202) by product/process knowledge	Estimated 45 pounds per month (based on hazardous waste manifests)	Accumulated in 55-gallon HWAC; full containers transferred to main HWCAA	Transported by Clean Harbors to Safety-Kleen Systems for incineration
4) Waste Flammable Liquids	Cleanup of labels and printing ink	Hazardous (D001, D035, F003 and F005) by product knowledge	Estimated ten pounds per month (based on hazardous waste manifests)	Accumulated in five-gallon satellite accumulation container, full containers transferred to main HWCAA	Transported by Clean Harbors to Safety-Kleen Systems for incineration

**Waste Stream and Waste Handling Table
Raining Rose, Inc. – Cedar Rapids, IA**

Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
5) Waste Flammable Liquid	Laboratory testing/ high performance liquid chromatography (HPLC); two ml vials (ether-methanol mixture) and 85% acetonitrile-methanol mixture	Hazardous (D001) product/process knowledge	Estimated three pounds per month (based on hazardous waste manifests and current accumulation)	Accumulated in five-gallon satellite accumulation container (SAC); full containers transferred to HWCAA	Transported by Clean Harbors to Safety-Kleen Systems for fuel blending
NOPF No. 1. See Visual Inspection section for associated findings, which includes failure to close satellite accumulation container.					
6) Virgin Raw Ingredients	Off Spec/expired commercial chemical product	Nonhazardous by product/process knowledge	2200 pounds/month	Collected/mixed in 55-gallon containers	Transported by Hydrite Chemical to WRR Environmental Services Co., Eau Claire, WI
7) Imaging Oil	Cleaning print press equipment	Nonhazardous by product/process knowledge	200 pounds/month	Collected in 55-gallon containers	Transported by Hydrite Chemical to WRR Environmental Services Co., Eau Claire, WI
8) Triethanol-amine	Off Spec/expired commercial chemical product	Nonhazardous by product/process knowledge	35 pounds/month	Collected in 55-gallon containers	Transported by Hydrite Chemical Tradebe Treatment and Recycling, East Chicago, IN

**Waste Stream and Waste Handling Table
Raining Rose, Inc. – Cedar Rapids, IA**

Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
9) Virgin Manufactured Products	Off Spec product	Nonhazardous by product/process knowledge	150 pounds/month	Collected in 55-gallon Containers or five-gallon containers	Transported by Hydrite Chemical to WRR Environmental Services Co., Eau Claire, WI
10) Empty Plastic Last Containing Sanitizer	Off spec/expired contents emptied into hazardous waste	Nonhazardous by product/process knowledge	15 pounds/month	Collected in 55-gallon containers	Transported by Hydrite Chemical to WRR Environmental Services Co., Eau Claire, WI
11) Travel Shave Cream Cans	Off Spec/expired commercial chemical product	Nonhazardous by product/process knowledge	10 pounds/month	Collected in five-gallon containers	Transported by Hydrite Chemical to WRR Environmental Services Co., Eau Claire, WI
12) Travel Scope Bottles	Off Spec/expired commercial chemical product	Nonhazardous by product/process knowledge Alcohol Exclusion 40 CFR §261.21(a)(1)	six pounds/month	Collected in five-gallon containers	Transported by Hydrite Chemical to WRR Environmental Services Co., Eau Claire, WI

**Waste Stream and Waste Handling Table
Raining Rose, Inc. – Cedar Rapids, IA**

Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
13) Oily Rags	Wiping oily product from the outside of product containers	Nonhazardous by product/process knowledge	Undetermined	Stored in cloth receptacles outside of the Left side label area.	Picked up and laundered by City Laundering in Cedar Rapids
14) Waste Fluorescent Lamps	Facility office maintenance	Nonhazardous (green tipped/lettered)	Estimated 60 pounds per year (based upon manifest and number in storage)	Stored in cardboard used lamps containers located in the HWCAA.	Transported by Safety Kleen Systems to Safety Kleen Systems in Davenport, IA, for recycling
15) Corrugated Cardboard	Packaging from inbound raw materials	Nonhazardous by product/process knowledge	252 tons per year	Placed into compactor container	Transported by ABC disposal to North Cedar Recycling, Stanwood, IA
16) Recycled Materials	Paper, Plastic and Styrofoam from packaging and office work	Nonhazardous by product/process knowledge	67 tons of paper; 49 tons of plastic; 24 tons of styrofoam annually	Stored in receptacles and placed in compactor for transportation	Transported by ABC disposal to North Cedar Recycling, Stanwood, IA

**Waste Stream and Waste Handling Table
Raining Rose, Inc. – Cedar Rapids, IA**

Name of Waste Stream	Generating Process	Hazardous Determination	Estimated Generation Rate	On-Site Management	Off-Site Management
17) Scrap Metal	Packaging and container recycling	Nonhazardous by product/process knowledge	Four tons annually	Accumulated receiving area in containers	Picked up by Marion Iron for recycling
18) General Trash	All other solid wastes (office/ packaging wastes, etc.) that are not recyclable	Nonhazardous by product/process knowledge	Approximately 24 cubic yards weekly (eight cubic yard container picked up three times per week)	Accumulated in various trash containers; transferred to eight-cubic-yard container	Transported by ABC Disposal to Linn County Landfill for landfill disposal

Visual Inspection

Production, packaging, warehouse and laboratory processes, and facility maintenance activities generate the solid and hazardous wastes listed in the Waste Stream and Waste Handling Table above. During the CEI, the generation, accumulation, and storage areas associated with these wastes were visually inspected. Each of the general areas described below are identified on the facility map obtained during the CEI (Attachment 10).

Photographs taken during the visual inspection are referenced and described in the discussions below. Additionally, I obtained an aerial photograph of the facility from Google Maps (Attachment 11).

Production area

In the Production area, there are ten (10) production lines for various products. At the end of each production schedule, the lines in the machines are flushed with olive oil. Lines are then flushed with isopropyl alcohol to rinse and sanitize the lines. Olive oil and isopropyl alcohol collected from the line flushing is collected and placed into a 55-gallon HWAC on the far east end of the production area (Attachment 6, Photograph 1). The container was holding less than five gallons of waste. Ms. Hansen and Mr. Hicks stated that the container is considered a satellite accumulation container (SAC). The container was closed, and labeled as hazardous waste but, the container was not at or near the point of generation, nor under the control of the operator. The HWAC was not dated at the time of the inspection.

NOPF No. 3 - Failure to mark hazardous waste storage container with an accumulation start date. [40 CFR §262.34(d)(4) Referencing §262.34(a)(2)].

I explained this preliminary finding to the group during the CEI. I explained that since the container was not at or near the point of generation (over 100 feet away from the farthest production line), the container cannot be considered a SAC.

I asked Ms. Hansen how long it took for the container to become full. She stated that the container is filled in approximately two weeks and moved to the HWCAA when it is full.

I also asked Ms. Hansen if the container was inspected and if so, how often. Ms. Hansen stated that all of the hazardous waste containers (SAC's and HWAC's) in the facility are inspected on a weekly basis by her. I asked Ms. Hansen who performs the inspections if the inspections are documented. She stated that all of the weekly inspections are performed by her and are documented. I asked how she would summon assistance if there is an emergency. Ms. Hansen stated that she is issued a company cellular phone and two-way radio. I reviewed inspection logs from August 1, 2016, to present during the records review portion of the CEI. Weekly inspections were all performed and documented. The most recent inspection record is included as Attachment 12.

Laboratory area

The group and I proceeded to the laboratory area where testing of products is performed. In the laboratory area, there were two SAC's. One, five-gallon plastic SAC contained small vials (two ml) from the high performance liquid chromatography (HPLC) testing (Attachment 6, Photograph 2). The vials contain residual mixture of ether/methanol. The container is holding less than one gallon of waste, based upon visual inspection (Attachment 6, Photograph 3). The container is closed, under control of the operator, near the point of generation, and identified as "hazardous waste".

A second, five-gallon plastic SAC was identified in the laboratory. This container is used for the collection of HPLC waste. The HPLC waste (D001 characteristic) consists of acetonitrile and methanol (Attachment 6, Photograph 4). During laboratory hours, the HPLC machine continuously drips into the container. The container is labeled as hazardous waste, under control of the operator and near the point of generation.

In the laboratory, I was introduced to the laboratory technician, Mr. Claussen. I presented him with a copy of 42 U.S.C. 1001/1002 (requiring the provision of truthful and accurate information and documentation). The document was read by Mr. Claussen prior to continuing the CEI. I then asked Mr. Claussen the hours that the laboratory operated. He stated that the laboratory operates one eight hour shift. I asked if the container with the HPLC waste was closed at the end of the shift. He stated that the tubes are not removed at the end of the shift and the container is left open. The container is not closed when the HPLC machine is shut down at the end of the shift, leaving the waste container open when waste is no longer being added.

NOPF No. 1 - Failure to keep satellite accumulation container closed [40 CFR §262.34(c)(1)(i) Referencing 265.173(a)].

I explained this preliminary finding to the group during the CEI. I explained that when the HPLC machine is shut down, the container must be closed to prevent release of the contents from the container.

Packaging area

In the packaging area, product containers are labeled and packaged in various boxes/containers for shipment to customers. Labels are placed on product containers and packaging containers.

Oily rags are generated from wiping the finished product containers prior to shipment. Oily rags are contaminated with various oils used in production. The oily rags are placed in cloth receptacles located just outside of the left side label area (Attachment 6, Photograph 5). Rags are picked up for laundering by City Laundering in Cedar Rapids, IA.

Labels are added to the containers in the packaging area. All labels are printed in the left side label room in the packaging area. Cleanup of the label production generates a waste ink and solvent mixture. The cleaning process generates a methyl ethyl ketone and waste ink mixture (D001, D035 characteristic; F003, F005 listed).

The waste from cleanup of the printing process is placed into a five-gallon SAC. The SAC is labeled as hazardous waste, closed, near the point of generation, and under control of the operator and contains approximately two gallons of waste (Attachment 6, Photograph 6).

HWCAA

The group and I continued the CEI and proceeded to the HWCAA located on the North side of the warehouse area. Located in the HWCAA, I observed nine, 55-gallon HWAC's (Attachment 6, Photographs 7 and 8). The 55-gallon containers staged in the HWCAA do not provide adequate space to be able to see the contents of the containers in the back row, nor the ability to adequately inspect the containers or maneuver spill control equipment.

NOPF No. 2 - Failure to maintain adequate aisle space in the hazardous waste container accumulation area to allow for container management and emergency equipment use [40 CFR §262.34(d)(2) Referencing 265.35].

I explained to the group that there is not adequate aisle space for maneuvering emergency equipment nor to effectively inspect containers due to the three 55-gallon containers in the front of the pallet rack and an inability to get to the containers located on the back of the pallet rack.

In addition to the nine, 55-gallon HWAC's; I observed five, five-gallon HWAC's, and one, 10-gallon HWAC (Attachment 6, Photographs 9 and 10).

The oldest dated container in storage was the 10-gallon HWAC, dated November 11, 2016 (stored for 173 days). The containers all were dated, labeled as hazardous waste, closed and in good condition during the inspection of the HWCAA.

Located in the HWCAA, waste lamps are stored prior to shipment off site. Three cardboard containers, labeled as waste lamps were identified (Attachment 6, Photograph 11). All of the containers were all labeled, dated and closed. The containers were all dated December 2, 2016. All of the lamps in the containers were green tipped/labeled (Attachment 6, Photograph 12).

Spill control equipment was identified adjacent to the HWCAA. A 55-gallon plastic container holding socks, mats and floor dry was identified (Attachment 6, Photograph 13). Additionally, a fire extinguisher is located next to the spill control equipment in the HWCAA (Attachment 6, Photograph 14).

Emergency Preparedness

The emergency contact information is posted in the HWCAA (Attachment 6, Photograph 15). The contact information was not posted near a phone, but according to Mr. Hach, all personnel carry two-way radios and are issued a company cell phone. According to Mr. Hach, the facility has arrangements with the local emergency agencies (i.e. fire department, hospital) in case of emergency. I noted the facility has a Hazardous Waste Emergency Information posted in the HWCAA. The posting lists the Emergency Coordinator's name and telephone numbers, and the fire department telephone number. The posting in the HWCAA also lists the location of spill control equipment, and fire extinguisher location.

Records

On May 10, 2017, I reviewed the following facility records:

- Hazardous Waste inspection Logs from August 1, 2016 to present (Attachment 12)
- Hazardous Waste manifests for large shipment on August 16, 2016, Manifest numbers 005364453SKS and 005364452SKS (Attachment 13)
- Hazardous Waste manifest for waste lamp shipment on February 2, 2017 (Attachment 14)
- Land disposal restriction (LDR) notification forms from August 2016 to present (copies of hazardous waste manifests and associated LDR Notification forms for shipments on October 7, 2016 and December 12, 2016 are included in Attachment 15 and 16, respectively)
- Waste Material Profile Sheets for hazardous wastes (Attachments 17 and 18)
- Waste stream approval letters for hazardous wastes (Attachments 19, 20 and 21)
- Training certificates for Mike Hicks and Desiree Hansen hazardous waste training for 2016 (Attachment 22 and 23)

Upon review of the hazardous waste manifests, and inspection logs, I noted RR generated two shipments on August 18, 2016, both in the amount of 9,600 pounds for a total of 19,200 pounds (Attachment 13). According to Mr. Hach, they had a product contamination and had to clean out all of the tanks and containers due to the contamination. The waste product was shipped off-site as a D001 hazardous waste and accounted for the one-time generation of the large quantity of hazardous waste. Since the contamination issue was resolved, RR is generating a total of approximately 941 pounds of hazardous waste each month.

RR has had 10 shipments of hazardous waste since August 18, 2016 and one shipment of waste lamps. I reviewed all 10 hazardous waste manifests and one manifest for waste lamps (Attachment 14).

During the manifest review, I noted all hazardous waste manifests have associated LDR Notification forms attached. Copies of hazardous waste manifests and associated LDR

Notification forms for shipments on, October 7, 2016 and December 12, 2016 are included in Attachments 15 and 16, respectively, as examples. I noted no RCRA concerns with hazardous waste manifests or associated LDR Notification forms.

At the conclusion of the CEI, I conducted an exit briefing with the group. I discussed the preliminary findings noted during the visual inspection and the regulations pertaining to each situation. In addition, I provided the following compliance assistance materials to Mr. Hicks:

- Copy of RCRA §3007(a)
- Copy of 42 U.S.C. 1001/1002
- EPA *Notification of Regulated Waste Activity*
- EPA *Publications for Small Business*
- EPA Information Sheet: *Commercial Motor Vehicle Transportation System Security & Safety-CMV Transportation Security Planning*
- EPA Homeland Security Bulletin: *US EPA Region 7, December 2001, Security Awareness for Agricultural/Industrial Facilities, Pipelines, Transporters, Utilities, Warehouses of Chemicals*
- EPA *Managing your Hazardous Waste, a Guide for Small Business*
- EPA Energy Star Information Sheet: *Frequently Asked Questions, Information on Compact Fluorescent Light Bulbs (CFLs) and Mercury*
- EPA Supplemental Information for Small Businesses Subject to a U.S. EPA Enforcement Action
- EPA Environmental Compliance Assistance Centers: Sector Specific Centers pamphlet
- EPA Office of Enforcement and Compliance Assurance Information Sheet: US EPA Small Business Resources handout
- EPA RCRA Online Reference Guide
- EPA Compliance Assistance Centers handout
- Pollution Engineering article *10 Common Questions for Waste Generators*
- Instructions for Responding to an NOPF

SUMMARY

During the RR CEI, I discovered through interviews with Facility Representatives, records review, and visual inspection that RR currently generates 941 pounds of hazardous waste generated per month. As such, RR is operating as a SQG of hazardous waste.


I issued an NOPF to RR at the conclusion of the CEI. This notice includes the following preliminary findings:

NOPF No. 1 - Failure to keep satellite accumulation container closed [40 CFR §262.34(c)(1)(i) Referencing 265.173(a)].

NOPF No. 2 - Failure to maintain adequate aisle space in the hazardous waste container accumulation area to allow for container management and emergency equipment use [40 CFR §262.34(d)(2) Referencing 265.35].
NOPF No. 3 - Failure to mark hazardous waste storage container with an accumulation start date. [40 CFR §262.34(d)(4) Referencing §262.34(a)(2)]

Before exiting the facility, I referred to the EPA TOCOR's information letter, and Technical Advisor (Mr. Witkovski) business card, which was presented to Messrs. Hach and Hicks and Ms. Hansen during the entry briefing. I encouraged them to provide Mr. Witkovski with written planned and/or completed actions as corrective measures to the NOPF.

Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.


Joshua A. Buehre

Date: 6/16/2017

ATTACHMENTS

- 1: Region 7 Multimedia Screening Checklist (2 pages)
- 2: Copies of Facility Representatives' Business Cards (1 page)
- 3: Copy of the EPA Confidentiality Notice (1 page)
- 4: Copy of the EPA Receipt for Documents and Samples (1 page)
- 5: Notice of Preliminary Findings (NOPF) (1 page)
- 6: Photographic Documentation (10 pages)
- 7: Copy of Hazardous Waste Site Info Verification Report for Inspector (2 pages)
- 8: Hazardous Waste Tracking Log (4 pages)
- 9: CEI Worksheets and Checklists (26 pages)
- 10: Copy of Facility Map (1 page)
- 11: Copy of Google Maps Image of Raining Rose, Inc. (1 page)
- 12: Copy of Weekly Waste Inspection Log Sheet (1 page)
- 13: Copy of Hazardous Waste Manifest and LDR Notifications 005364453SKS and 005364452SKS (4 pages)
- 14: Copy of Hazardous Waste Manifest 0058322093SKS (1 page)
- 15: Copy of Hazardous Waste Manifest 005557297SKS and LDR (2 pages)
- 16: Copy of Hazardous Waste Manifest 005715291SKS and LDR (2 pages)
- 17: Copy of WMPS, 1225549 for Soybean Oil Mixed with IPA and Bees Wax (3 pages)
- 18: Copy of WMPS, CH1273875 for Isopropanol (3 pages)
- 19: Copy of Waste Stream Approval Letter, 142440 for Expired Flammable Liquids (3 pages)
- 20: Copy of Waste Stream Approval Letter, 143362 for Hazardous Powder - Lye (3 pages)
- 21: Copy of Waste Stream Approval Letter, 142448 for HPLC Chemicals (3 pages)
- 22: Copy of Training Certificates of Achievement for Hazardous Waste Management course from September 16, 2016 for Michael John Hicks and Desiree Hansen (2 pages)
- 23: Copy of Certificate of Achievement for Hazmat Ground Shipper Certification dated November 14, 2016, for Desiree Hansen (1 page).

Forward To:

EPCRA / RMP / TSCA ☒

CWA ☐

Wetlands ☐

UIC ☐

PWS ☐

CAA ☐ RCRA ☐

UST ☐

SPCC ☒

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Ranving Rose, Inc.

Facility Ownership: Same

Street: 100 30th St. Dr. SE

City: Cedar Rapids

State: IA

Zip: 52403

Phone: 319 362 8100

Facility Contact: Mike Hicks

Number of Employees: 200

Work Hours/Shifts

3 shifts 7-3, 3-11, 11-7
in packaging
2 shifts in Prod 5am-5pm, 5pm-5am

Inspector: Joshua Buehne

Primary Media: RCRA

Inspector Phone Ext.: 816 448 3253

Date: 5/10/2017

SIC/NAICS Code 325611

Facility Subject to OSHA regulations Yes ☒ No ☐

Main facility activity, major process chemical(s) & description: 90% production of lip balm -

10% production of lotions, sunscreens, hand sanitizers

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐) , printing ☐ , reacting ☐ , formulating ☒ , distilling ☐ ,
water treatment ☐ , refrigeration ☐ , manufacturing ☒ , parts washers/degreasing (water-based ☐ , halogenated-based ☐ ,
non-halogenated-based ☐) , combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other ☐).

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ Forward to EPCRA
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ Forward to EPCRA
3. Has the facility: If any box in question 3 is marked - Forward to EPCRA
 - a. Stored ≥500 lbs of ammonia ☐ , ≥100 lbs of chlorine ☐ , or ≥10,000 lbs of an industrial chemical ☐ , at any time over the last 2 years? ☐
 - b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
 - c. Used ≥10,000 lbs of ammonia ☐ , chlorine ☐ , halogenated solvents ☐ , solvent-based paints ☐ , or solvents ☐ , or nitrated compound, over the last calendar year? ☐
 - d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ Forward to PCB and ask Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ - Get Photo

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any water/wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
If yes, are all water/wastewater discharges permitted? Yes ☐ No ☐ Forward to CWA
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☒ (stop) Yes ☐
If yes, are the discharges permitted by: State? ☐ , City? ☐ - If yes, Stop here. No ☐ Forward to CWA
If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ Forward to CWA
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ Forward to CWA
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____
(Get Photo) Forward to CWA
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (Get Photo) FWD to Wetlands

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ *Forward to UIC*
If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ *Forward to PWS*
If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA)

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ *Forward to CAA*
Source _____ (*Get Photo*)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☒ (stop) Yes ☐
If yes, is equipment permitted? Yes ☐ No ☐ *Forward to CAA Describe:* _____
3. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia? No ☒ (stop) Yes ☐ *Forward to EPCRA/RMP*

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☒
If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ *Forward to RCRA*
2. Is hazardous waste treated ☐, stored ☒ ^{22 days}, burned ☐, land filled ☐, put in surface impoundments ☐ or waste piles ☐?
No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☒ No ☐ *Forward to RCRA*
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☒ (stop) Yes ☐

Material Claimed To Be Non-Hazardous

How does the facility know these wastes are non-hazardous?

_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>
_____	Testing, industry or manuf. info., MSDS, etc. <input type="checkbox"/> ; None available <input type="checkbox"/> <i>Forward to RCRA</i>

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ *Forward to RCRA*
Describe: _____ (*Get Photo*)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ *Forward to RCRA*
Describe: _____ (*Get Photo*)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ *Forward to RCRA & EPCRA Describe:* _____ (*Get Photo*)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ *Forward to UST*
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ *Forward to UST*

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
No ☐ (stop) Yes ☒ - Does the facility have a certified SPCC Plan? Yes ☐ No ☒ *Forward to SPCC*
If yes, are there secondary containment systems for the tanks? Yes ☒ No ☐ *Forward to SPCC*
If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☒ Yes ☐ (*Get Photo*) *Forward to SPCC*

Mike Hicks
Logistics Manager



raining rose®

| 100 30th st dr se | cedar rapids, ia | 52403-1403 | 800-481-3934 |
| direct 319-265-7167 | fax 319-362-8139 | www.rainingrose.com |
mhicks@rainingrose.com

Natural Lip Balms · SPF Lip Balms · Body Care

FDA Audited & Approved Facility · GMP Compliant · USDA Certified Organic Manufacturer

Kyle Hach
Vice President of Operations



raining rose®

| 100 30th st dr se | cedar rapids, ia | 52403-1403 | 800-481-3934 |
| direct 319-297-3945 | fax 319-362-8139 | www.rainingrose.com |
khach@rainingrose.com

Natural Lip Balms · SPF Lip Balms · Body Care

FDA Audited & Approved Facility · GMP Compliant · USDA Certified Organic Manufacturer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>Raining Rose, Inc.</i>	
Facility Address <i>100 30th Drive SE, Cedar Rapids, IA 52403</i>	
Inspector (print) <i>Joshua Buehne</i>	
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219 <i>Booz Allen Hamilton</i>	Date <i>5/10/2017</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Mike Hicks</i>	Signature/Date <i>M Hicks 5-10-17</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

Attachment 3 Page 1 of 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name <i>Raining Rose, Inc.</i>
Facility Address <i>100 30th Drive SE, Cedar Rapids, IA 52403</i>

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☐ Split Samples: YES ☐ NO ☐

Documents/ Samples were: 1) Received no charge ☐ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- ① Facility Map (1 page)
- ② Training Certificates (3 pages)
- ③ Waste Profiles (15 pages)
- ④ Hazardous Waste Manifests (8 pages)
- ⑤ Universal Waste Manifest (1 page)
- ⑥ Inspection log example (1 page)
- ⑦ Waste tracking log (4 pages)

Facility Representative (print) <i>Mike Hicks</i>	Signature/Date <i>Mike Hicks 5-10-17</i>
Inspector (print) <i>Joshua Buehne</i>	Signature/Date <i>Joshua Buehne 5/10/17</i>
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219 <i>JAB</i>	

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Raining Rose, Inc.
 ADDRESS: 100 30th St Dr SE
Cedar Rapids, IA 52403
 EPA ID NUMBER: IAR000521807 DATE: 5/10/17

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to keep satellite accumulation container closed 40 CFR 262.34(c)(1) - 265.173(a)
2. Failure to maintain adequate aisle space in Hazardous waste Container Accumulation Area to allow for container management and emergency equipment use. 40 CFR 262.34(d)(2) - 265.35
3. Failure to mark hazardous waste storage container with an accumulation start date. 40 CFR 262.34(d)(4) - 262.34(a)(2)
4.
5.
6.
7.

If you have any questions regarding these findings please contact

Gary Witkowski

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Mike Hicks TITLE: Logistics Manager

SIGNATURE: M Hicks

This document was prepared by Toshua Buehler

** sent an email to facility contact advising them of charges in citations*

PHOTO LOG

Facility Name / City: Raining Rose, Inc.
100 30th St. Dr. SE
Cedar Rapids, IA 52403

Facility ID #: IAR000521807

Date: May 10, 2017

Photographer: Joshua A. Buehre

Type of Camera: Sony Digital Still Camera, DSC – W370, Serial #567825

Digital Recording Media: Memory Stick

All digital Photos were copied by: Joshua A. Buehre on 05/31/2017

All digital Photos were copied to: to print and CD-R

Original copy is stored in: CD-R. All digital Photos were downloaded to CD-R by Joshua A. Buehre on 05/31/2017. No changes were made in the original image files prior to print and storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
1	Joshua Buehre	05/10/2017	0901	001	One 55-gallon HWAC located in the production area. The container holds less than five gallons of waste and is not dated.
2	Joshua Buehre	05/10/2017	0908	003	One, Five-gallon satellite accumulation container (SAC) in the Laboratory that contain an ether/methanol mixture.
3	Joshua Buehre	05/10/2017	0908	002	Photo of the 5-gallon container in photograph 2 showing there is less than one gallon of vials in the container. Vials each contain two milliliters of liquid.
4	Joshua Buehre	05/10/2017	0910	004	One, Five-gallon SAC located in the laboratory for collection of Acetonitrile/methanol waste mixture. The container is open for continuous addition of waste. The container is not closed when laboratory is not operating.
5	Joshua Buehre	05/10/2017	0915	005	Oily cloth rags receptacles. Rags are utilized for wiping containers clean in the packaging area. Used rags are laundered through City Laundering, located in Cedar Rapids, IA.
6	Joshua Buehre	05/10/2017	0917	006	Five-gallon SAC located in the left side label area. The SAC is stored in a flammable cabinet except when adding waste.
7	Joshua Buehre	05/10/2017	0929	008	Photograph of three, 55-gallon HWAC's located in the HWCAA. All containers are identified as to contents, dated and in good condition.
8	Joshua Buehre	05/10/2017	0929	009	Photograph of six, 55-gallon HWAC's located in the HWCAA. All containers are identified as to contents, dated and in good condition. Aisle space does not allow for maneuvering, ease of inspection or accessibility in case of emergency.
9	Joshua Buehre	05/10/2017	0929	011	Photo of two, five-gallon HWAC and one, 10-gallon HWAC in the HWCAA. All containers are identified as to contents, dated and in good condition.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSC00xxx.jpg)	Description
9	Joshua Buehre	05/10/2017	0929	011	Photo of two, five-gallon HWAC and one, 10-gallon HWAC in the HWCAA. All containers are identified as to contents, dated and in good condition.
10	Joshua Buehre	05/10/2017	0929	012	Photo of three, five-gallon HWAC's and one in the HWCAA. All containers are identified as to contents, dated and in good condition.
11	Joshua Buehre	05/10/2017	0935	014	Three, waste lamps containers in the HWCAA. The three boxes contain a total of 131 lamps.
12	Joshua Buehre	05/10/2017	0933	013	Photo of contents of waste lamps container contents identified in Photo 11. All lamps are green tipped or green lettered.
13	Joshua Buehre	05/10/2017	0937	015	Photo of one, 55-gallon spill kit container adjacent to the HWCAA. The container holds sock, pads and floor dry for cleanup of spills
14	Joshua Buehre	05/10/2017	0937	016	Photo of the spill kit and fire extinguisher located next to the HWCAA. The HWAC's can be seen under the pallet rack in the background.
15	Joshua Buehre	05/10/2017	0924	007	Photo of the Emergency contact information located in the HWCAA. The emergency coordinator, fire department and police numbers are posted. Additionally, the location of the spill equipment and fire extinguisher is also provided on the emergency contact information sheet.

RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 1
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0901
Description: One 55-gallon
HWAC located in the production area.
The container holds less than five gallons
of waste and is not dated.



Photo Number: 2
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0908
Description: One, Five-gallon
satellite accumulation container (SAC) in
the Laboratory that contain an
ether/methanol mixture.



RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 3
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0908
Description: Photo of the 5-gallon SAC in photograph 2 showing there is less than one gallon of vials in the container. Vials each contain two milliliters of liquid.



Photo Number: 4
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0910
Description: One, Five-gallon SAC located in the laboratory for collection of Acetonitrile/methanol waste mixture. The container is open for continuous addition of waste. The container is not closed when laboratory is not operating.

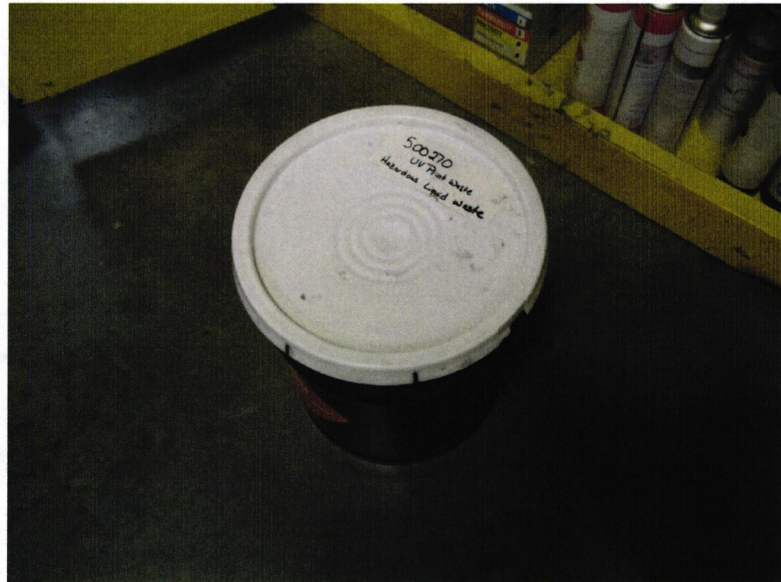


RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 5
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0915
Description: Oily cloth rags
receptacles. Rags are utilized for wiping
containers clean in the packaging area.
Used rags are laundered through City
Laundering, located in Cedar Rapids, IA.



Photo Number: 6
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0834
Description: One, Five-gallon
SAC located in the left side label area.
The SAC is stored in a flammable cabinet
except when adding waste.



RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 7
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0929
Description: Photograph of
Three, 55-gallon HWAC's located in the
HWCAA. All containers are identified as
to contents, dated and in good condition.



Photo Number: 8
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0929
Description: Photograph of six, 55-
gallon HWAC's located in the HWCAA.
All containers are identified as to contents,
dated and in good condition. Aisle space
does not allow for maneuvering, ease of
inspection or accessibility in case of
emergency.



RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 9
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0929
Description: Photo of two, five-gallon HWAC and one, 10-gallon HWAC in the HWCAA. All containers are identified as to contents, dated and in good condition.



Photo Number: 10
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0929
Description: Photo of three, five-gallon HWAC's and one in the HWCAA. All containers are identified as to contents, dated and in good condition.



RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 11
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0935
Description: Three, waste lamps
containers in the HWCAA. The three
boxes contain a total of 131 lamps.



Photo Number: 12
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0933
Description: Photo of contents of
waste lamps container contents identified in
Photo 11. All lamps are green tipped or
green lettered.



RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 13
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0937
Description: Photo of one, 55-gallon spill kit container adjacent to the HWCAA. The container holds socks, pads and floor dry for cleanup of spills.

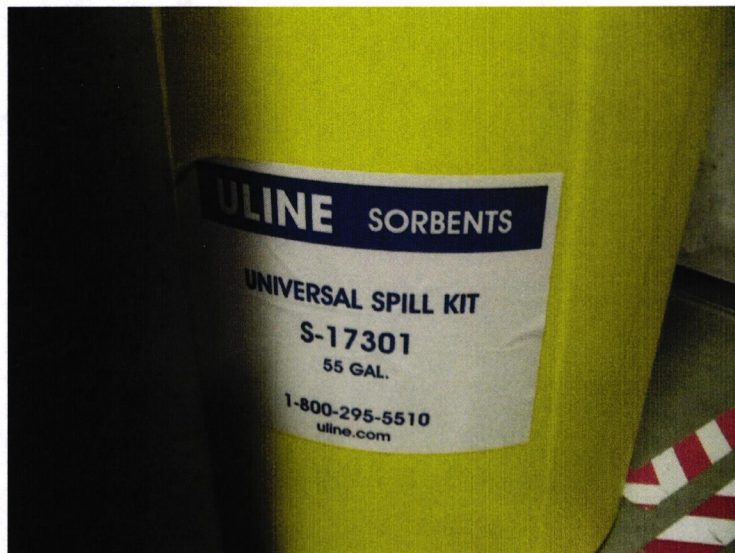
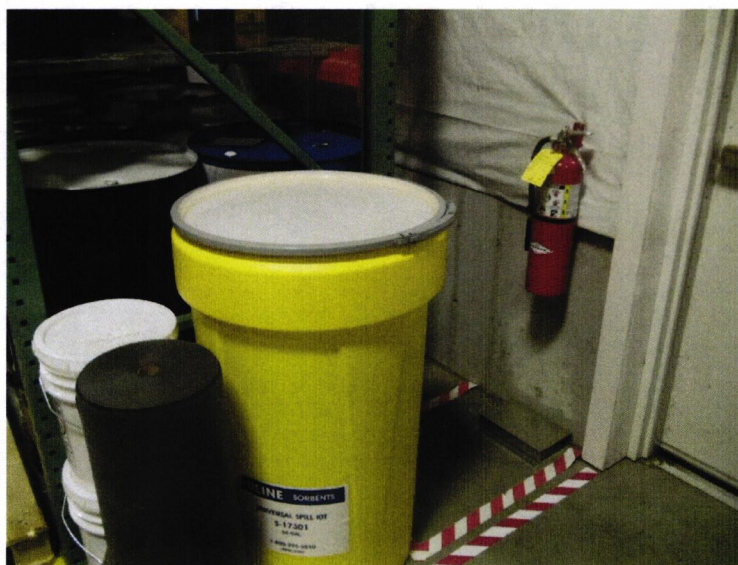


Photo Number: 14
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0937
Description: Photo of the spill kit and fire extinguisher located next to the HWCAA. The HWAC's can be seen under the pallet rack in the background.



RAINING ROSE, INC
CEDAR RAPIDS, IA

Photo Number: 15
Photographer: Joshua A. Buehre
Date: 05/10/2017
Time: 0924
Description: Photo of the
Emergency contact information located in
the HWCAA. The emergency
coordinator, fire department and police
numbers are posted. Additionally, the
location of the spill equipment and fire
extinguisher is also provided on the
emergency contact information sheet.



Hazardous Waste Site Info Verification Report for Inspector

March 6, 2017

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:
Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to Elizabeth Koesterer, AWMD/WEMM.

Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate State.

EPA RCRA ID Number:

IAR000521807

Name of Company/Site:

RAINING ROSE INC

Location of Site:

100 30TH ST DR SE
CEDAR RAPIDS, IA 52403
LINN County

Land Type:

Private

NAICS:

325611 - SOAP AND OTHER DETERGENT MANUFACTURING

Mailing Address:

100 30TH ST DR SE
CEDAR RAPIDS, IA 52403

Site Contact:

MIKE HICKS

Job Title:

LOGISTICS MANAGER

Address:

100 30TH ST DR SE
CEDAR RAPIDS, IA 52403

Email:

MHICKS@RAININGROSE.COM

Phone Number:

319-362-8101

Current Owner of Site:

RAINING ROSE INC

Phone Number:

319-362-8101

Owner Type:

Private

Current Operator of Site:

RAINING ROSE INC

Phone Number:

319-362-8101

Operator Type:

Private

TYPE(S) OF REGULATED ACTIVITY: Federal Small Quantity Generator

JAB
SOH Universal Waste

Date of Site Visit: 5/10/2017

Name of Inspector (Please print): Joshua Bucher

(Check one): ☐ EPA R7 ENST ☒ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector/Investigator: Joshua Bucher

Hazardous Waste Site Info Verification Report for Inspector

March 6, 2017

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:
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Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate State.

Hazardous Wastes Handled: D001 D002 U112 U202 F003, F005, D035, W88

1st N 08/04/16 N 08/08/16 2

Certified by Notification on 08/08/16 by
KIM CHANDLER 08/04/16
REGULATORY SPECIALIST

Date of Site Visit: 5/10/2017
Name of Inspector (Please print): Joshua Buehve
(Check one): ☐ EPA R7 ENST ☒ EPA R7 Contractor ☐ NOWCC/SEE Investigator
Signature of Inspector/Investigator: Joshua Buehve

HAZARDOUS WASTE MANIFEST LOG																		
Waste Company	Waste System	Manifest/Trip Ticket/Receipt #	Containers		Total Weight		Hazardous Waste Code				Transporter1	Transporter2	Receiving Facility	Receiving State	Land Ban (Yes or No)	Date of First Manifest/Trip Ticket/Receipt #	Date of Complete Manifest/Trip Ticket/Receipt #	Date of Exception Report Date
			Quantity	Type	STS	Units	D001	D002	D003	D004								
Hydrite Chemical	500363	009944096FLE	1	dm	144	p	D001				Hydrite Chemical	Coal City Cob-TX	WRR Environmental Services	WI	Yes	1/30/2017	2/8/2017	
Hydrite Chemical	500402	009944096FLE	2	dm	240	p	NRM				Hydrite Chemical	Coal City Cob-TX	WRR Environmental Services	WI	Yes	1/30/2017	2/8/2017	
Hydrite Chemical	500363	009944097FLE	1	cm	25	p	D001				Hydrite Chemical	Coal City Cob-TX	WRR Environmental Services	WI	Yes	1/30/2017	2/8/2017	
Hydrite Chemical	500401	009944097FLE	4	cm	102	p	D001	U112			Hydrite Chemical	Coal City Cob-TX	WRR Environmental Services	WI	Yes	1/30/2017	2/8/2017	
Hydrite Chemical	500272	009944097FLE	1	cm	21	p	D001				Hydrite Chemical	Coal City Cob-TX	WRR Environmental Services	WI	Yes	1/30/2017	2/8/2017	
Hydrite Chemical	143362	009944097FLE	1	dm	110	p	D002				Hydrite Chemical	Coal City Cob-TX	WRR Environmental Services	WI	Yes	1/30/2017	2/8/2017	
Safety Kleen	CH1273875	005832208SKS	3	dm	1299	p	D001				Safety-Kleen Systems	Union Gas	Safety-Kleen Systems	KY	Yes	2/2/2017	2/16/2017	
Safety Kleen	1225549	005832208SKS	1	dm	438	p	D001				Safety-Kleen Systems	Union Gas	Safety-Kleen Systems	KY	Yes	2/2/2017	2/16/2017	
Hydrite Chemical	500273	009944226FLE	1	cm	23	p	F005	D001	D035	F003	Safety-Kleen Systems	Coal City Cob-TX	WRR Environmental Services	WI	Yes	3/27/2017	4/7/2017	
Hydrite Chemical	500363	009944226FLE	1	cm	25	p	D001				Safety-Kleen Systems	Coal City Cob-TX	WRR Environmental Services	WI	Yes	3/27/2017	4/7/2017	
Hydrite Chemical	500272	009944226FLE	1	cm	16	p	D001				Safety-Kleen Systems	Coal City Cob-TX	WRR Environmental Services	WI	Yes	3/27/2017	4/7/2017	
Hydrite Chemical	500270	009944226FLE	1	cm	44	p	D001	F003			Safety-Kleen Systems	Coal City Cob-TX	WRR Environmental Services	WI	Yes	3/27/2017	4/7/2017	

Universal Waste MANIFEST LOG

Waste Stream	Manifest/Trip Ticket/Receipt #	Quantity	Units	Waste Code			Transporter	Receiving Facility	Receiving State	Land Ban (Yes or No)	Date of First Manifest/Trip Ticket/Receipt #	Date of Complete Manifest/Trip Ticket/Receipt #	Date of Exception Report Date
Lamps	005832209SKS	2	cf	None			Safety-Kleen	Safety-Kleen Systems	IA	Yes	2/2/2017	2/2/2017	

HAZARDOUS WASTE MANIFEST LOG																		
Waste Company	Waste Stream	Manifest/Trip Ticket/Receipt #	Quantity	Units	Drum Count	Waste Code				Generator	Transporter 1	Transporter 2	Receiving Facility	Receiving State	Land Ban (Yes or No)	Date of First Manifest/Trip Ticket/Receipt #	Date of Complete Manifest/Trip Ticket/Receipt #	Date of Exception Report Date
Hydrite	142448	BOL-288283	100	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	6/11/2015		
Hydrite	142448	BOL-291375	82	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	8/27/2015	8/31/2015	
Hydrite	143362	BOL-295997	229	lbs		D002				Hydrite Chemical			WRR Environmental Services	WI	Yes	12/17/2015	12/22/2015	
Clean Harbors	CH1120392	008829195FLE	700	lbs	4	U188				Clean Harbors Environmental Service	Pioneer Tank Lines		Clean Harbors Deer Park	TX	Yes	1/4/2016	1/8/2016	
Clean Harbors	CH1121050	008829196FLE	300	lbs	1					Clean Harbors Environmental Service	Pioneer Tank Lines		Spring Grove Resource Recovery	OH	Yes	1/4/2016	1/8/2016	
Hydrite	143362	BOL-297317	229	lbs		D002				Hydrite Chemical			WRR Environmental Services	WI	Yes	1/28/2016	2/1/2016	
Hydrite	143362	BOL-298546	52	lbs		D002				Hydrite Chemical			WRR Environmental Services	WI	Yes	2/25/2016		
Hydrite	142448	BOL-298545	101	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	2/25/2016		
Hydrite	142440	BOL-299827	230	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	3/28/2016	4/5/2016	
Hydrite	142440	BOL-301058	107	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	4/28/2016	5/5/2016	
Hydrite	143362	BOL-301059	74	lbs		D002				Hydrite Chemical			WRR Environmental Services	WI	Yes	4/28/2016	5/5/2016	
Hydrite	500311	BOL-302186	~400	lbs		NA3082				Hydrite Chemical			WRR Environmental Services	WI	Yes	5/23/2016		
Hydrite	500315	BOL-302190	64	lbs		NA1993				Hydrite Chemical			WRR Environmental Services	WI	Yes	5/23/2016	5/31/2016	
Safety-Kleen	1225549	005325595SKS	2650	lbs	8	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	7/18/2016	7/25/2016	
Hydrite	143362	BOL-304583	124	lbs		D002				Hydrite Chemical			WRR Environmental Services	WI	Yes	7/28/2016	8/2/2016	
Hydrite	142448	BOL-304581	137	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	7/28/2016	8/2/2016	
Safety-Kleen	1225549	005364452SKS	~9600	lbs	24	D001				Safety-Kleen	Robbie D. Wood, Inc.		Safety-Kleen Systems	KY	Yes	8/18/2016	9/6/2016	
Safety-Kleen	1225549	005364453SKS	~9600	lbs	24	D001				Safety-Kleen	Robbie D. Wood, Inc.		Safety-Kleen Systems	KY	Yes	8/18/2016	9/6/2016	
Safety-Kleen	1225549	005364467SKS	400	lbs	1	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	8/22/2016	9/8/2016	
Safety-Kleen	CH1273875	005364457SKS	780	lbs	2	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	8/22/2016	9/8/2016	
Hydrite	500270	008746746FLE	47	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	8/29/2016	9/7/2016	
Hydrite	500272	008746746FLE	169	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	8/29/2016	9/7/2016	
Hydrite	142440	008746746FLE	259	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	8/29/2016	9/7/2016	
Hydrite	500362	008746745FLE	90	lbs		U202				Hydrite Chemical			WRR Environmental Services	WI	Yes	8/29/2016	9/7/2016	
Hydrite	500273	008746745FLE	74	lbs		F005	D001	F003	D035	Hydrite Chemical			WRR Environmental Services	WI	Yes	8/29/2016	9/7/2016	
Hydrite	500361	008746745FLE	34	lbs		U112				Hydrite Chemical			WRR Environmental Services	WI	Yes	8/29/2016	9/7/2016	
Safety-Kleen	1225549	005557128SKS	750	lbs	2	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	9/13/2016	9/26/2016	
Safety-Kleen	1225549	005557335SKS	100	lbs	1	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	9/21/2016	10/5/2016	
Safety-Kleen	CH1273875	005557335SKS	350	lbs	1	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	9/21/2016	10/5/2016	
Hydrite	500363	008746863FLE	93	lbs		D001				Hydrite Chemical			WRR Environmental Services	WI	Yes	10/10/2016	10/12/2016	
Safety-Kleen	CH1273875	005557297SKS	657	lbs	2	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	10/7/2016	10/24/2016	
Safety-Kleen	CH1273875	005715291SKS	600	lbs	2	D001				Safety-Kleen	Union Gas		Safety-Kleen Systems	KY	Yes	12/12/2016	12/21/2016	

Universal Waste MANIFEST LOG

Waste Stream	Manifest/Trip Ticket/Receipt #	Quantity	Units	Waste Code			Transporter	Receiving Facility	Land Ban (Yes or No)	Date of First Manifest/Trip Ticket/Receipt #	Date of Complete Manifest/Trip Ticket/Receipt #	Date of Exception Report Date
Universal Waste Lamps	005715292SKS	2	Bx				Safety-Kleen	Safety-Kleen Systems	Yes	12/12/2016	12/12/2016	

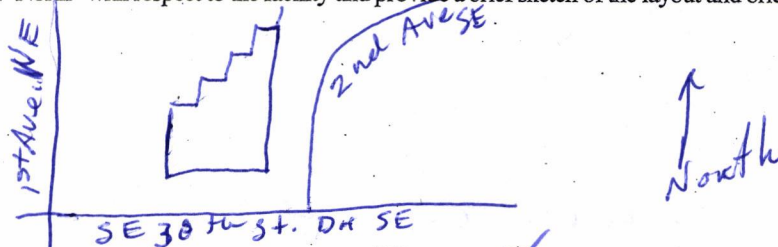
Appendix 1-3

Facility: Rainy Rose Inc Date: 5/10/17 Arrival time: 0810

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No

- | | | | |
|--------------------|--------------------|------------------------|-----------------------|
| - Containers | - Tanks | - Processing Equipment | - Loading Areas |
| - Unloading Areas | - Security Devices | - Open Drums | - Stressed Vegetation |
| - Unusual Staining | - Unusual Odors | - Obvious Discharges | - Improper Disposal |
| - Safety Concerns | - Other Concerns | | |

Appendix 1-4

SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☒ No

2. Facility Representative(s): Mike Hicks Title: Logistics mgr.
Kyle Mach Title: VP operations
Desiree Hansen Title: Inventory specialist

3. Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

How long in position? 5

4. Introduction:

- ☒ Presented credentials
- ☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☒ Verified presence at correct facility (checked address/I.D. #)
- ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☒ Explained the purpose, scope, and order of the inspection
- ☒ Completed Multimedia screening checklist
- ☒ Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☒ Provided SBRFA
- ☐ Obtained GPS reading
- ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☐ By facility representative or Other (name): Mike Hicks
☐ No - Access denied. Name of person denying access: _____

Time of denial: _____

Reason for denial, or limitations placed on access:

Appendix 1-5

FACILITY BACKGROUND WORKSHEET

1. Site History:

Date facility began operating: _____ Number of employees: 200+
 Number of shifts/hour worked: production packaging 3/ Number of days worked per week: 7
 Size (sq. ft., how divided): 100,000 sq. ft. office, Production, Packaging and warehouse
 Property owner and facility operator the same? ☒ Yes ☐ No

2. Major products or services provided: Vegetable, coconut, sunflower oils, Bees wax, methanol, Isopropyl Alcohol to man
Manufactures lip balm (90%), Lotions, sunscreens, sanitizers (10%)
 3. Major raw materials used: Vegetable, coconut, sunflower oils, Bees wax, Methanol

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process

Waste Stream(s)

See Generator Waste Stream Worksheets

JAB

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☒ Yes ☐ No

Updated form to include SQH of Universal waste and added characteristic waste code D035 and listed waste codes F003 + F005

7. **GENERATOR STATUS:** (based on records review)

- ☐ Non-generator
☐ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)
☒ SQG (100-1000kg/mo and accumulate <6000kg)
☐ LQG (>1000kg/mo)

Is facility's status solidly within above category?
 (If not carefully verify status and document)

☒ Yes ☐ No

8. **TSD STATUS:**

☐ Treatment ☐ Storage ☐ Disposal

Note: Types of units, number of units, capacities, processes, etc:

JAB

9. Resolved questions from Pre-Inspection Worksheet?

☐ Yes ☐ No ☒ No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet?

☐ Yes ☐ No ☒ No Questions

11. Requested site map or diagram to identify all observations?

☒ Yes ☐ None Available

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: Isopropanol (IPA)
- FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate
- WASTE CODES: D001
- DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing
- Documentation: MSDS
- GENERATING PROCESS: Cleaning Process equipment
- GENERATION RATE: 883 lbs/mo
- ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☒ Visually inspected
- Accumulated in 55-gallon HWAC's
- OFF-SITE MANAGEMENT/DISPOSITION: Transported by Clean Harbors to Safety Klean Systems in Smithfield, KY for fuel Blending
2. WASTE STREAM: Soybean oil mixed w/ IPA and Bees Wax
- FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate
- WASTE CODES: D001
- DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing
- Documentation: MSDS, waste stream ^{IAB} Management Profile
- GENERATING PROCESS: Clean up of contaminated waste
- GENERATION RATE: 19,200 gallons one-time
- ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected
- None on-site during inspection
- OFF-SITE MANAGEMENT/DISPOSITION: Transported by Safety Klean Systems to SKS in Smithfield, KY for fuel blending
3. WASTE STREAM: off specification or outdated Commercial Chemical Prod.
- FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate
- WASTE CODES: D001, F003, F005
- DETERMINATION METHOD: ☐ Product knowledge ☒ Process knowledge ☐ Testing
- Documentation: MSDS, Waste Stream Approval letters
- GENERATING PROCESS: expired products
- GENERATION RATE: 10 pounds per month
- ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☒ Visually inspected
- Accumulated in 5-gallon containers
- OFF-SITE MANAGEMENT/DISPOSITION: _____

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

4. ~~JAB~~ 1. WASTE STREAM: Waste flammable liquids
 FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate
 WASTE CODES: D001, D035, F003, F005
 DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing
 Documentation: MSDS
 GENERATING PROCESS: Cleanup of
 GENERATION RATE: 10 pounds / mo
 ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☒ Visually inspected
Accumulated in 5-gallon containers.
 OFF-SITE MANAGEMENT/DISPOSITION: SKS to SKS for incineration

5. ~~JAB~~ 2. WASTE STREAM: Waste flammable liquids
 FACILITY DETERMINATION: ☒ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate
 WASTE CODES: D001
 DETERMINATION METHOD: ☒ Product knowledge ☐ Process knowledge ☐ Testing
 Documentation: HPLC-JAB MSDS
 GENERATING PROCESS: HPLC waste
 GENERATION RATE: 3 pounds / mo
 ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☒ Visually inspected
SAA container is 5-gallon plastic pail
consolidated to HPLC
 OFF-SITE MANAGEMENT/DISPOSITION: SKS to SKS for fuel blending

6. ~~JAB~~ 3. WASTE STREAM: Virgin Raw Ingredients
 FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate
 WASTE CODES: —
 DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing
 Documentation: —
 GENERATING PROCESS: off-spec, expired com. chem. prod.
 GENERATION RATE: 2200 pounds / mo
 ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☐ Visually inspected
55-gallon containers
 OFF-SITE MANAGEMENT/DISPOSITION: Hydrote transports to WRR in Wisconsin

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

7. WASTE STREAM:

Imaging oil

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: —

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: —

GENERATING PROCESS: cleaning print press equipment.

GENERATION RATE: 200 Pounds/mo

ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☐ Visually inspected

55 gallon containers

OFF-SITE MANAGEMENT/DISPOSITION: Hydrote to WRR in Wisconsin

8. WASTE STREAM:

Triethanolamine

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: —

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: —

GENERATING PROCESS: off spec, expanded comm. chem. prod.

GENERATION RATE: —

ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☐ Visually inspected

55-gallon containers

OFF-SITE MANAGEMENT/DISPOSITION: Hydrote to WRR in Wisconsin

9. WASTE STREAM:

Virgin Manufactured Products

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: —

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: —

GENERATING PROCESS: off-spec product.

GENERATION RATE: 150 pounds/mo

ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☐ Visually inspected

55-gallon and 5-gallon containers

OFF-SITE MANAGEMENT/DISPOSITION: Hydrote to WRR in Wisconsin

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

10. ^{JAB} 1. WASTE STREAM: Empty Plastic Containers last contained Sanitizer

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: _____

GENERATING PROCESS: off-spec product

GENERATION RATE: _____

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

collected in 55-gallon + 5-gallon containers

OFF-SITE MANAGEMENT/DISPOSITION: Hydrite to WRR in Wisconsin

11. ^{JAB} 2. WASTE STREAM: Travel Shave Cream Cans

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: _____

GENERATING PROCESS: off spec / expired comm chem product

GENERATION RATE: 10 pounds / mo

ON-SITE MANAGEMENT: Satellites ☒ Visually inspected Storage ☐ Visually inspected

collected in 5 gallon containers

OFF-SITE MANAGEMENT/DISPOSITION: Hydrite to WRR in Wisconsin

12. ^{JAB} 3. WASTE STREAM: Travel Scope Bottles

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation: Alcohol exemption

GENERATING PROCESS: off spec / expired comm. chem. product

GENERATION RATE: ~~5.1~~ ^{JAB} six pounds / mo

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☒ Visually inspected

collected in 5-gallon containers

OFF-SITE MANAGEMENT/DISPOSITION: Hydrite to WRR in Wisconsin

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

13 JAB

1. WASTE STREAM: oily RagsFACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: —DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ TestingDocumentation: —GENERATING PROCESS: wiping containers clean in packagingGENERATION RATE: undeterminedON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspectedstored in hampers / cloth containers next to left side lab area.OFF-SITE MANAGEMENT/DISPOSITION: Picked up and laundered by city laundry in cedar Rapids

14 JAB

2. WASTE STREAM: Waste Fluorescent LampsFACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: —DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ TestingDocumentation: —GENERATING PROCESS: MaintenanceGENERATION RATE: 60-90 pounds / yearON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspectedstored in used lamps containers in HWC AAOFF-SITE MANAGEMENT/DISPOSITION: SKS to SKS Danport, IA

15 JAB

3. WASTE STREAM: Corrugated cardboardFACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ InadequateWASTE CODES: —DETERMINATION METHOD: ☐ Product knowledge ☒ Process knowledge ☐ TestingDocumentation: —GENERATING PROCESS: Packaging from in bond raw materialsGENERATION RATE: 252 Tons / yearON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspectedcomputer containerOFF-SITE MANAGEMENT/DISPOSITION: Transported by ABC to Recycling center in Stanwood, IA

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

16. JAB
1. WASTE STREAM:

Recycled Materials

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☒ Product knowledge ☒ Process knowledge ☐ Testing

Documentation:

GENERATING PROCESS: Paper, Plastic, styrofoam from packaging, products and offices

GENERATION RATE: 67 tons/yr - Paper 49 tons/yr - Plastic

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected 24 tons/yr - styrofoam Storage ☐ Visually inspected

stored in receptacles & cont. throughout facility

OFF-SITE MANAGEMENT/DISPOSITION: Transported by ABC Disposal to North cedar Recycling, Stanwood, IA

17. JAB
2. WASTE STREAM:

Scrap Metal

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☐ Product knowledge ☒ Process knowledge ☐ Testing

Documentation:

GENERATING PROCESS: container Recycling / Packaging

GENERATION RATE: 4 tons Annually

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

Accumulated in receiving area containers

OFF-SITE MANAGEMENT/DISPOSITION: Marion Iron - Transport & Recycle

18. JAB
3. WASTE STREAM:

General Trash

FACILITY DETERMINATION: ☐ Hazardous ☒ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☐ Product knowledge ☒ Process knowledge ☐ Testing

Documentation:

GENERATING PROCESS: normal trash that isn't recyclable

GENERATION RATE: 24 cubic yards weekly

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

Receptacles throughout facility to 8 cubic yard container outside

OFF-SITE MANAGEMENT/DISPOSITION: ABC Disposal to Linco. Landfill

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM:

FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation:

GENERATING PROCESS:

GENERATION RATE:

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION:

2. WASTE STREAM:

FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation:

GENERATING PROCESS:

GENERATION RATE:

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION:

3. WASTE STREAM:

FACILITY DETERMINATION: ☐ Hazardous ☐ Non-hazardous ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☐ Product knowledge ☐ Process knowledge ☐ Testing

Documentation:

GENERATING PROCESS:

GENERATION RATE:

ON-SITE MANAGEMENT: Satellites ☐ Visually inspected Storage ☐ Visually inspected

OFF-SITE MANAGEMENT/DISPOSITION:

Appendix 1-7

OFF-SITE WASTE STREAM WORKSHEET – TSD's ONLY

1. Name or type of waste stream(s): _____

2. Amount and frequency received (note amount per ?):
 _____ Gallons _____ Pounds _____ Tons per ☐ Day ☐ Month ☐ Year

☐ Other: _____

3. On-site management practices (check all that apply):
☐ Container Storage ☐ Tank Storage ☐ Treatment
☐ Disposal ☐ Other: _____

4. Off-site management activities: ☐ N/A
 Shipped to: _____
 Frequency of shipments: _____
 Transporter: _____
 Ultimate disposition of waste: ☐ Known ☐ Unknown

5. Number of years/months facility managed this waste: From: _____ To: _____

6. Facility considers this waste to be: ☐ Hazardous ☐ Non-Hazardous

7. Method of waste determination/identification: ☐ Not completed by facility
 (check all that apply)
☐ By generator supplied information ☐ By testing

8. EPA waste codes: _____

9. Is waste stream consistent with generator Notification? ☐ YES ☐ NO

10. Notes/Observations: _____

Appendix 1-8

RECORDS REVIEW WORKSHEET AND CHECKLIST

A. MANIFESTS

#	✓ / X	REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
1.	✓	Facility uses manifest system-262.20(a)(1)	
2.	✓	Manifests maintained for 3 years-262.40(a)	
3.	✓	Generator EPA I.D. number-262.20(a)	
4.	✓	Generator name, address, phone number-262.20(a)	
5.	✓	Transporter(s) name & EPA I.D. number-262.20(a)	
6.	✓	Designate facility name, address & EPA I.D. number-262.20(a)	
7.	NA	Alternate facility designated (optional)-262.20(c)	
8.	✓	Unique pre-printed manifest tracking number and number of pages-262.20(a)	
9.	✓	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
10.	✓	Containers: numbers, type, quantity, unit wt/vol.-262.20(a)	
11.	✓	Proper certification including waste minimization-262.20(a)	
12.	✓	Signed and dated-262.23(a)	
13.	NA	Exception report submitted if necessary-262.42	
14.	NA	Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	
15.	NA	Generator maintains copy of contractual agreement for at least 3 years after termination or expiration of the agreement (SQG only)-262.20(e)(2)	
16.	✓	LDR notification/certification sent with manifests on 1 st shipment-268.7(a)(2)	
17.	✓	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7(a)(2)	
18.	✓	LDR notification/certification/waste analysis data & other documents maintained for 3 years-268.7(a)(8)	
19.	✓	Biennial Reports submitted per 262.41 (LQG only)	

✓ - in compliance X - not in compliance N/A - not applicable

20. Approximate number of manifests generated since last inspection, or over past 3 years: 10

21. Approximate number of manifests reviewed: 10

22. Copies of manifests made with regulatory violations? ☐ YES ☒ NO

JAB

23. Additional requirements for off-site generated manifests:

#	√ / x	ADDITIONAL I.S./PERMIT* REGULATORY REQUIREMENTS	MANIFEST #'S AND COMMENTS
a.	NA	Manifests signed and dated-265.71(a)(2)(i)	- Not required prior to inspection CESQ
b.	NA	Manifest discrepancies noted and corrected w/in 15 days-265.71(a)(2)(ii)	
c.	NA	Copy immediately given to transporter-265.71(a)(2)(iii)	
d.	NA	Copy sent to generator w/in 30 days-265.71(a)(2)(iv)	
e.	NA	Manifests retained for 3 years-265.71(a)(2)(v)	
f.	NA	LDR notification/certifications retained for 3 years-268.7(e)(2)	
g.	NA	Biennial Reports submitted per 265.75	

√ - in compliance X - not in compliance N/A - not applicable * - please not applicable permit requirement

h. Approximate number of manifests generated since last inspection, or over past 3 years: _____

i. Approximate number of manifests reviewed: _____ never inspected

j. Copies of manifests made with regulatory violations? ☐ YES ☐ NO

B. PREPAREDNESS AND PREVENTION

#	√ / x	REGULATORY REQUIREMENTS	COMMENTS
1.	✓	Arrangements with local emergency agencies made-262.34(d)(4)→265.37 [SQG] or 262.34(a)(4)→265.37 [LQG, I.S.]	- no phone near area use cell phones or 2-way radios
2.	✓	Emergency coordinator on premises or on call-262.34(d)(5)(i) [SQG] or 262.34(a)(4)→265.55 [LQG, I.S.]	
3.	✓	Emergency coordinator's name and phone number, fire department's phone number, and the location of fire extinguishers and spill control equipment posted near the phone [SQG only]-262.34(d)(5)(ii)	

√ - in compliance X - not in compliance N/A - not applicable

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C. CONTINGENCY PLAN

(SQG – N/A, LQG's – 262.34(a)(4) referencing 265 Subpart D, I.S.-265 only)

#	✓/ X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Has contingency plan→265.51(a)	
2.	NA	Contingency plan maintained on-site→265.53(a)	
3.		Plan submitted to emergency response agencies→265.53(b)	
4.		Description of actions needed to respond to fires, explosions, or releases of hazardous wastes→265.52(a)	
5.		Description of arrangements with local emergency agencies, as appropriate→265.52(c)	
6.		List names, addresses & phone numbers (both home and office) of emergency coordinators & designated primary EC→265.52(d)	
7.		List & describe emergency equipment its location, and its capabilities, as required→265.52(e)	
8.		Include complete evacuation plan (signal, alternate route), if required→265.52(f)	
9.		Emergency coordinator must be thoroughly familiar with all aspects of facility→265.55	

✓ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

D. PERSONNEL TRAINING

(SQG – 262.34(d)(5)(iii), LQG's – 262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	✓/ X	REGULATORY REQUIREMENTS*	COMMENTS
1.	NA	Program director trained in hazardous waste management procedures (LQG only)→265.16(a)(2)	
2.	NA	Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)→265.16(b)	
3.	NA	Employees are trained annually (LQG only)→265.16(c)	
4.	NA	Job title & name of person filling position specified (LQG only)→265.16(d)(1)	
5.	NA	Written job description including: skills, education or qualification, and duties (LQG only)→265.16(d)(2)	
6.	NA	Written description of type and amount of introductory & continuing training provided (LQG only)→265.16(d)(3)	
7.	NA	Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)→265.16(a)(3)	
8.	NA	Documentation confirming training has been completed (LQG only)→265.16(d)(4)	
9.	NA	Records maintained on-site for current employees & for 3 years for former employees→265.16(d) & (e) respectively	
10.	✓	All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)→262.34(d)(5)(iii)	

✓ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

11. Notes/Observations: _____

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: Dee-ree Hansen office

2. Person responsible for waste analysis/waste determination: Dee-ree Hansen

#	✓/ X	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal-262.11(d)→268.7(a)(1)	
5.	✓	Determines waste does <u>not</u> meet applicable treatment standards (ATS)-268.7(a)(2)	
a.	NA	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(2)	
b.		SQG disposes of waste under a contractual or tolling agreement-268.7(a)(10). (LDR Notice available for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement)	
6.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-268.5 & 6. (Describe the variance, extension, or petition that applies)	
a.		Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-268.7(a)(4).	
7.	✓	Ships waste(s) covered by the LDRs off-site for treatment or disposal-268.7(a)(2). If no, go to 8.	
a.	✓	Provides a notice with initial shipment, or new notification, if changes occur-268.7(a)(2)	
b.	✓	Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-268.7(a)(2)→268.7(a)(4)	
8.	NA	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation-268.7(a)(7)	
a.		Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files-268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice-268.7(a)(2)(i))	
9.		Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment-268.7(a)(3)	
a.		One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(3)(i)	
10.	✓	Additional special rules regarding waste that exhibits a characteristic-268.9	

a.	NA	If not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)-268.9(a)
b.	↓	If land disposed, waste meets the treatment standards specified in 268 Subpart D-268.9(c)
c.	↓	First claims that their characteristic waste is no longer hazardous-sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation or receiving facility-268.9(d)
11.	✓	Impermissible dilution of waste to meet LDR standards in not occurring-268.3(a) & (b)
12.	NA	If hazardous waste prohibited from land disposal is either: a contaminated soil, or is a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge – See additional LDR checklists in Appendix 2-1
13.	↓	References to Waste Specific Prohibitions under Subpart C: - Wood Preserving Wastes – 268.30 - Dioxin-containing Wastes – 268.31 - TC Metal Wastes – 268.34 - Petroleum Refining Wastes – 268.35 - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated – 268.37 - Newly Identified Organic Toxicity Characteristic Wastes and Newly Listed Coke By-Product and Chlorotoluene Production Wastes – 268.38 - Spent Aluminum Pot Liners; Reactive; and Carbamate Wastes – 268.39
14.	↓	Prohibition on Storage of Restricted Waste-268.50
15.	↓	Reminder – Treatment Standards listed in 268.41 through 268.49

- Notification

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

16. Notes/Observations:

F. OPERATING RECORD (SQG – N/A, LQG's – N/A)

JAB

#	√/ X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Written operation record maintained on-site, and until closure-265.73(a) & (b) respectively	
2.		Description of quantity (estimated weight or volume & density), method(s) and date(s) of treatment, storage, or disposal, including: name & EPA waste code(s), physical form, process which produced waste, & handling codes-265.73(b)(1)	
3.		Location and quantity of each hazardous waste at facility cross-referenced to the specific manifest-265.73(b)(2)	

√ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

G. INSPECTIONS (SQG – N/A, LQG's – N/A)

JAB

#	√/ X	REGULATORY REQUIREMENTS*	COMMENTS
1.		Facility is inspected for malfunctions and discharges which may lead to a release or human threat-265.15(a)	
2.		Written schedule for inspecting & monitoring safety, emergency, security, operating & structural equipment-265.15(b)(1)	
3.		Schedule maintained at facility-265.15(b)(2)	
4.		Schedule identifies all types of problems looked for and frequency of inspections-265.15(b)(3-4)	
5.		Areas subject to spills, such as loading/unloading areas, are inspected daily when in use-265.15(b)(4)	
6.		Facility remedies all problems found-265.15(c)	
7.		Inspection records identify the name of inspector, the date & time of inspection, & the date and nature of repairs-265.15(d)	
8.		Inspection records maintained for 3 years-265.15(d)	

√ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

Appendix 1-9

VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA *Man HWC AA*
(Complete one form per storage area)

1. Type of storage area: ☐ <90 day ☒ <180 day ☐ <270 day ☐ I.S. ☐ Permit

2. I.S./Permitted capacity:

#	✓ / x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)	
5.	✓	Containers in good condition-262.34(a)(1)(i)→265.171	
6.	✓	Containers are compatible with waste-262.34(a)(1)(i)→265.172	
7.	✓	Containers kept closed-262.34(a)(1)(i)→265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34(a)(1)(i)→265.173(b)	
9.	✓	Containers storing incompatibles separated or protected from each other-262.34(a)(1)(i)→265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQGs, I.S. & Permit, only]-262.34(a)(1)(i)→265.176	
11.	x	Adequate aisle space for type of container management and emergency equipment used-262.34(a)(4)→265.35	<i>- HWC AA cannot access containers in back row for inspection or maneuvering emergency spill equip.</i>
12.	✓	Container stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-262.34(a)(1)(i)→265.174	
ADDITIONAL I.S. REQUIREMENTS*			
14.		Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections of loading/unloading areas (when in use)-265.15(a)(4)	
PRE-TRANSPORT REQUIREMENTS*			
20.	NA	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	NA	Placards available for use by transporters when applicable-262.33	

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-262.34(a)(4)→265.34	- All employees equipped w/ 2 way radios or cellular phones
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.) - 262.34(a)(4)→265.32(c)	
24.	✓	Adequate water supply for fire control equipment- 262.34(a)(4)→265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-262.34(a)(4)→265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-262.34(a)(4)→265.31	

✓ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

27. Container inventory: ☐ Actual Count ☐ Approximate count

Waste Type	Container Size	Total
D001	9 x55 gal. x 30 gal.	495 gallons
D002	x55 gal. x 30 gal. 1x5 gal	59 gallons
D001, D035	x55 gal. x 30 gal. 2x5 gal	109 gallons
D001, D035, F003, F005	x55 gal. x 30 gal. 2x5 gal	109 gallons
	x55 gal. x 30 gal.	
	x55 gal. x 30 gal.	
	x55 gal. x 30 gal.	

Total Quantity (pounds, gallons, etc.): 520 gallons

28. How were container volumes verified? Visual

29. Photos taken to verify observations: ☒ YES ☐ NO Numbers: 7-10 see report

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes/Observations:

Appendix 1-9

VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

Production Area

(Complete one form per storage area)

1. Type of storage area: ☐ <90 day ☒ <180 day ☐ <270 day ☐ I.S. ☐ Permit

2. I.S./Permitted capacity: _____

#	✓ / x	REGULATORY REQUIREMENTS*	COMMENTS	
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	<i>Marked</i> - container not labeled with date of accumulation	
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)		
5.	✓	Containers in good condition-262.34(a)(1)(i)→265.171		
6.	✓	Containers are compatible with waste-262.34(a)(1)(i)→265.172		
7.	✓	Containers kept closed-262.34(a)(1)(i)→265.173(a)		
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34(a)(1)(i)→265.173(b)		
9.	NA	Containers storing incompatibles separated or protected from each other-262.34(a)(1)(i)→265.177		
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQGs, I.S. & Permit, only]-262.34(a)(1)(i)→265.176		
11.	✓	Adequate aisle space for type of container management and emergency equipment used-262.34(a)(4)→265.35		
12.	✓	Container stored for less than 90/180/270 days, as applicable-262.34		
13.	✓	Storage area inspected weekly-262.34(a)(1)(i)→265.174		
ADDITIONAL I.S. REQUIREMENTS*				JAB
14.		Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)		
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)		
16.		"No Smoking" signs conspicuously posted-265.17(a)		
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)		
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)		
19.		Daily inspections of loading/unloading areas (when in use)-265.15(a)(4)		
PRE-TRANSPORT REQUIREMENTS*				
20.	NA	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively		
21.	NA	Placards available for use by transporters when applicable-262.33		

#	✓/ X	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-262.34(a)(4)→265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.) - 262.34(a)(4)→265.32(c)	
24.	✓	Adequate water supply for fire control equipment-262.34(a)(4)→265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-262.34(a)(4)→265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-262.34(a)(4)→265.31	

✓ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

27. Container inventory: ☐ Actual Count ☐ Approximate count

Waste Type	Container Size	Total
<u>DOOL</u>	<u>1</u> x55 gal. x 30 gal.	<u>1555</u> gallons ^{JAB}
	x55 gal. x 30 gal.	
	x55 gal. x 30 gal.	
	x55 gal. x 30 gal.	
	x55 gal. x 30 gal.	
	x55 gal. x 30 gal.	
	x55 gal. x 30 gal.	

Total Quantity (pounds, gallons, etc.): 1555 gallons

28. How were container volumes verified? Visual

29. Photos taken to verify observations: ☒ YES ☐ NO Numbers: see report

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes/Observations:

B. SATELLITE ACCUMULATION AREA(S)1. Total number of satellite areas inspected at facility: 2

#	REGULATORY REQUIREMENTS	SA1: <u>lab</u>	SA2: <u>left side label</u>	SA3: _____	SA4: _____
2.	Area at or near the point of generation-262.34(c)(1)	✓	✓		
3.	Area under the direct control of operator-262.34(c)(1)	✓	✓		
4.	Quantities accumulated do not exceed 55 gallons or 1 quart (acute)-262.34(c)(1)	✓	✓		
5.	Excess accumulation removed within 3 days-262.34(c)(2)	✓	✓		
6.	Containers marked identifying their contents-262.34(c)(1)(ii)	✓	✓		
7.	Containers in good condition-262.34(c)(1)(i)→265.171	✓	✓		
8.	Containers are compatible with waste-262.34(c)(1)(i)→265.172	✓	✓		
9.	Containers kept closed-262.34(c)(1)(i)→265.173(a)	X	✓		

✓ - in compliance X - not in compliance N/A - not applicable

Above Satellite Areas with problems:SA1: Name/Location of area: labPerson responsible for area: Desiree HansenType(s) and Volumes of waste accumulated: HPCC wasteNumber and Type of containers: 2, 5-gallon containersSA2: Name/Location of area: left side label - NO ISSUESPerson responsible for area: Desiree HansenType(s) and Volumes of waste accumulated: Ink wasteNumber and Type of containers: 1 5-gallon

SA3: Name/Location of area: _____

Person responsible for area: _____

Type(s) and Volumes of waste accumulated: _____

Number and Type of containers: _____

SA4: Name/Location of area: _____

Person responsible for area: _____

Type(s) and Volumes of waste accumulated: _____

Number and Type of containers: _____

C. TANK STORAGE AREA

1. Total number of tanks at facility: _____
2. I.S./Permitted total capacity: _____
3. Assessing EXISTING tanks (a tank that is used for storage or treatment and that is in operation, or for which installation has commenced on or prior to July 14, 1986) without secondary containment:

#	✓ / X	REGULATORY REQUIREMENTS*	COMMENTS
a.		Performed on all existing tanks by independent PE-265.191(a)	
b.		Performed within 12 months on existing systems which store material that becomes hazardous waste subsequent to July 14, 1986-265.191(c)	
c.		Assessment covers: design standards, characteristics of waste, existing corrosion protection, age, leak test for non-enterable tanks, and ancillary equipment-265.191(b)	

✓ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

4. Assessing NEW (a tank that will be used for storage or treatment and for which installation has commenced after July 14, 1986, except for variance purposes) tank systems:

#	✓ / X	REGULATORY REQUIREMENTS*	COMMENTS
a.		Written assessment on all new tank systems and components by independent PE-265.192(a)	
b.		Assessment covers: design standards, characteristics of waste, corrosion protection (completed by corrosion expert), tightness prior to use-265.192(a)(1-5)	
c.		Installation inspection performed by independent professional engineer-265.192(b)	
d.		Certification statements of design and inspection at facility-265.192(g)	

✓ - in compliance X - not in compliance N/A - not applicable * - please note applicable permit requirements

#	LQG/I.S. REGULATORY REQUIREMENTS*	Tank #1	Tank #2	Tank #3	Tank #4
5.	Secondary containment (sec. cont.) for all new tanks, installed after July 14, 1986, over 15 years old, or unknown age in facility over 15 years old; repaired, replaced, or reinstalled after July 14, 1986-265.193(a)				
6.	Sec. cont. material constructed of impervious & compatible material-265.193(c)(1)				
7.	Sec. cont. capable of preventing failure due to settlement, compression or uplift-265.193(c)(2)				
8.	Sec. cont. of ancillary equipment, except above ground piping, welded flanges, joints, connections, sealless or magnetic pumps, pressurized piping with automatic shutoff devices, if inspected daily-265.193(f)				
9.	Sec. cont. provided with leak detection system capable of detecting leaks within a 24 hr. period-265.193(c)(3)				

JAB

Tank #2 - Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ PermitPhotos taken? ☐ YES ☐ NO Photo numbers: _____Area noted on map or diagram: ☐ YES ☐ NO

Tank #3 - Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ PermitPhotos taken? ☐ YES ☐ NO Photo numbers: _____Area noted on map or diagram: ☐ YES ☐ NO

Tank #4 - Name & location of tank: _____

Person responsible for tank area: _____

Age of tank when it first stored/treated/held a hazardous waste: _____

How was age verified? _____

Tank design capacity: _____ Type of waste in tank: _____

Volume currently in the tank: _____ How was volume verified? _____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ PermitPhotos taken? ☐ YES ☐ NO Photo numbers: _____Area noted on map or diagram: ☐ YES ☐ NO

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
 - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
 - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.

- NA* ☐ Identified/verified violations from previous inspection were corrected (if applicable)
- ☒ Addressed all unresolved inspection related issues
- ☒ Summarized findings and observations for the facility representatives

NOV issued? ☒ Yes ☐ No ☒ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

- ☒ Explained the importance of a timely (14 day) and adequate response
- ☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☒ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
- ☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
- ☒ Provided facility with CBI form
- ☒ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☒ No

4. Facility appears to have awareness of RCRA regulations? ☒ Yes ☐ No

5. Facility has its own environmental staff? ☐ Yes ☒ No

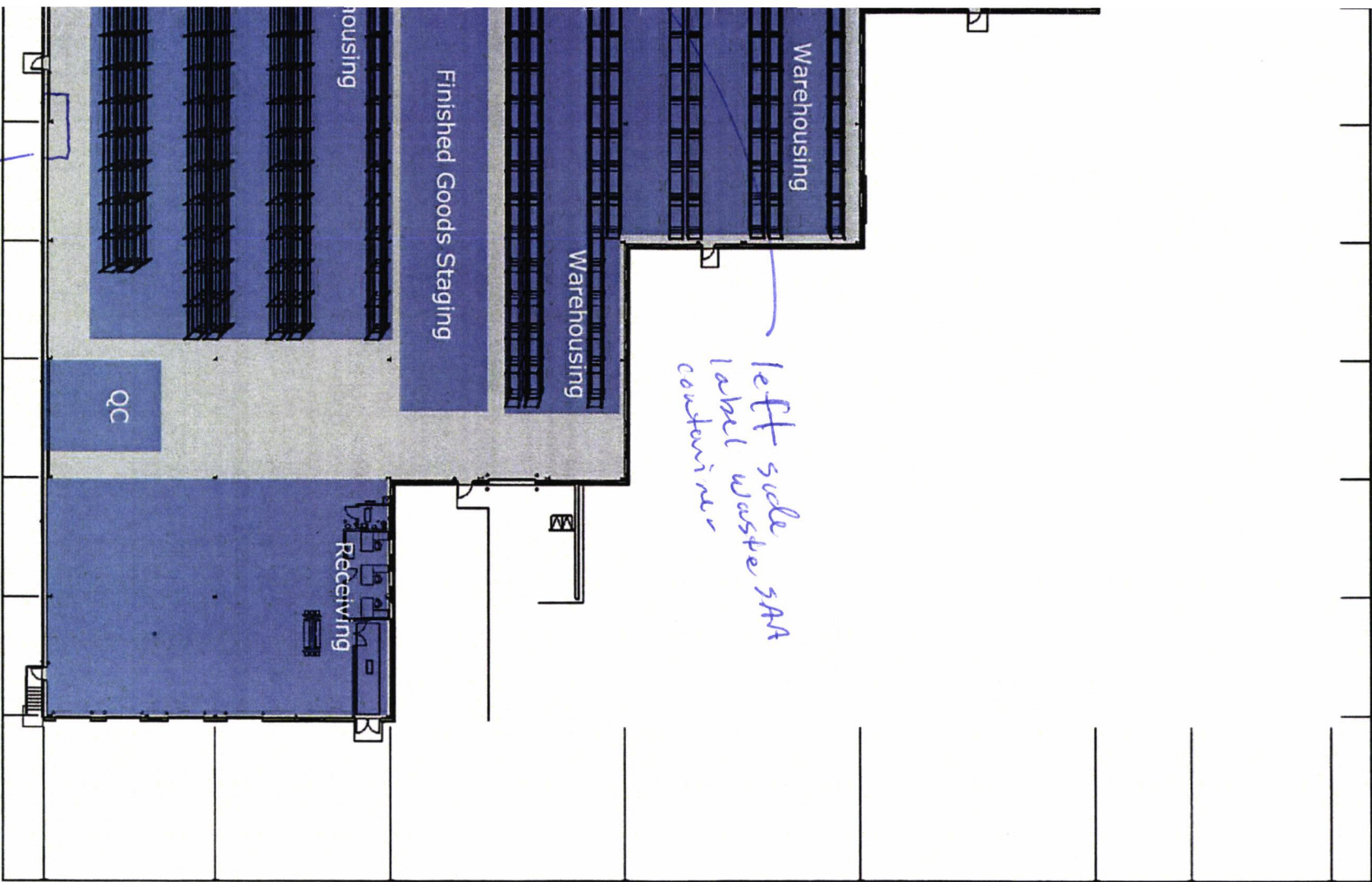
6. Facility has copy of applicable regulations? ☒ Yes ☐ No


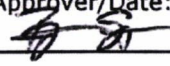
7. Attitude and demeanor of facility representative(s); ☒ OK ☐ Not OK

8. Notes/Observations:

HWACh

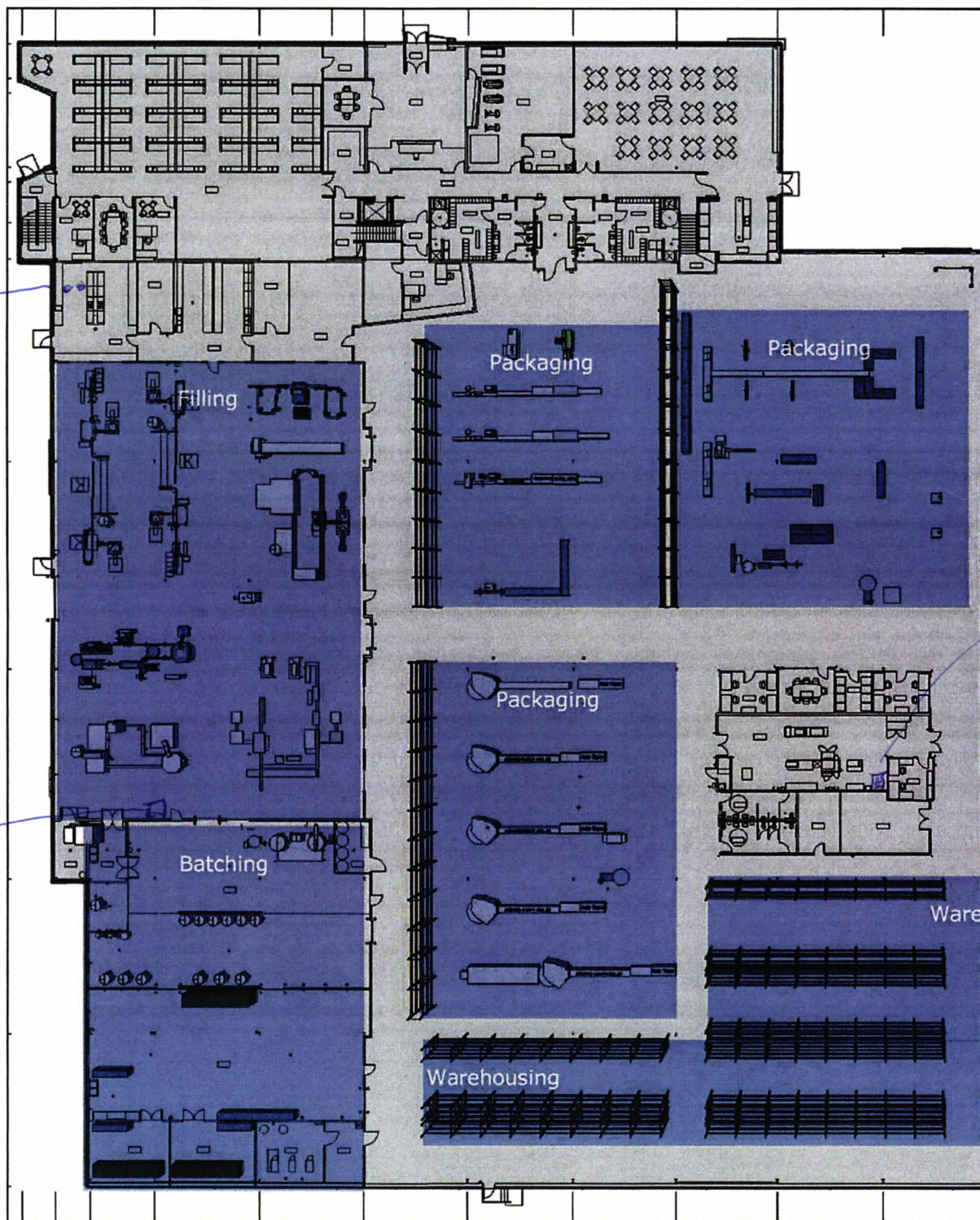
Attachment 10 Page 1 of 1



 Raining Rose Inc. 100 30th St. Dr. SE Cedar Rapids IA 52403	ISSUING DEPARTMENT: Engineering	AUTHOR: Justin Reynolds 11/9/16	REVISIONS	
			MM/DD/YY	REMARKS
			00 11 /18 /15	Date created
			01 11/9/16	J. reynolds: Updated equipment layout
			02 -- / -- / --	...
TITLE: Plant Layout	Doc. Number: MP004	Approver/Date:  11/9/16	03 -- / -- / --	...
			04 -- / -- / --	...

lab w/
2 5-gal
cont.

55 gal
containers





Google Earth

feet
meters



Weekly Waste Inspection Log Sheet

Month Apr Year 2017

Record any problems and document how they were corrected and the date of correction. Attach extra sheet if necessary.

	Date:	Week13	Week14	Week15	Week16	Comments
1.	Is there <55 gallons hazardous waste in each Satellite Accumulation Area (SAA)?	3/31/17 yes	4/7/17 yes	4/13/17 yes	4/24/17 yes	
2.	Estimated Accumulation of waste in gallons?	26.852	NA	NA	38.25	
3.	Estimated total accumulation of waste in pounds? (Using 1 Gallon=9lbs Worst Case Scenario)	241.668	NA	NA	344.25	
4.	Are the containers compatible with contents?	yes	yes	yes	yes	
5.	Are all containers in good condition/not leaking?	yes	yes	yes	yes	
6.	Are containers securely closed when not in use?	yes	yes	yes	yes	
7.	Are containers properly labeled and dated?	yes	yes	yes	yes	
8.	Is there adequate space between storage containers?	yes	yes	yes	yes	
9.	Are the required signs legible and posted?	yes	yes	yes	yes	
10.	Is spill equipment available and not expired?	yes	yes	yes	yes	
11.	Is internal communication system functional?	yes	yes	yes	yes	
	Initials of Inspector	DOH	DOH	DOH	DOH	

Inspections must be completed at least every 7 days, even during shutdowns. Questions 4-8 pertain to all waste areas.

DSV

SK SHIP# 220040321


 005364453 SKS
 Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IACESQG	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1750	4. Manifest Tracking Number 005364453 SKS	
5. Generator's Name and Mailing Address Raining Rose 100 30th Street Drive Sou CEDAR RAPIDS Generator's Phone: 319-265-7157			Generator's Site Address (if different than mailing address) IA 52403-0007			
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.				U.S. EPA ID Number TXR000081205		
7. Transporter 2 Company Name Robbie D. Wood, Inc.				U.S. EPA ID Number AL0067130891		
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068 Facility's Phone: 502-845-2453				U.S. EPA ID Number KYD053348108		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.
	X	1. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. MIXTURE, (ISOPROPANOL), 3, PG II (D001)	002	DM	0110	G
	X	2. UN1993, WASTE FLAMMABLE LIQUID, N.O.S. MIXTURE, (ISOPROPANOL), 3, PG II (D001)	022	DF	01210	G
		3.				
		4.				
13. Waste Codes						
14. Special Handling Instructions and Additional Information TSD:SMR 71209613 RA22126 CSG: 1) ERG#128; 2) ERG#128 24 HR EMERGENCY #1-800-468-1750 (SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name Brian Jellison				Signature 		Month Day Year 8/18/16
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name Joe Danney			Signature 		Month Day Year 8/18/16
	Transporter 2 Printed/Typed Name Douglas Rondello			Signature 		Month Day Year 9/3/16
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number.					
	18b. Alternate Facility (or Generator) U.S. EPA ID Number					
	Facility's Phone: _____					
	18c. Signature of Alternate Facility (or Generator)					Month Day Year 8/18/16
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H111 H061	2. H061	3.	4.		
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name M Freeman				Signature 		Month Day Year 8/18/16

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

1) 7818178/1225549

2) 7818178/1225549

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)


Attachment 13 Page 1 of 4

SAFETY-KLEEN 08/17/2016 PAGE:1
LDR NOTIFICATION FORM 10:20:54
PLANT: DSV
GENERATOR NAME: Raining Rose
MANIFEST NO.: 0053644875105
OR SALES SERVICE NO.: 71209613
CUST#: RA22126
SK Shipping #: 220040321
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKI-RFL NO: 1225549
SKDOT#: 7818178
EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LQ LIQUID >= 10% TOC
Treatability group: NNW Non-Waste Water
Waste Constituent Notification: None

NOTES


GENERATOR'S AUTHORIZED
SIGNATURE
PLANT: DSV
TOP COPY: GENERATOR

Brian J. Ellison
NAME & TITLE
(PRINTED OR TYPED)
CSG: REF:
MIDDLE COPY: FACILITY

08/18/2016
DATE
SW:
BOTTOM COPY: TRANSFER

DSV

SK SHIP# 220040311



005364452 SKS

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IACESQG	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 005364452 SKS		
5. Generator's Name and Mailing Address Raining Rose 100 30th Street Drive Sou CEDAR RAPIDS IA 52403-0000			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.			U.S. EPA ID Number TXR000081205				
7. Transporter 2 Company Name Robbie D. Woods Inc.			U.S. EPA ID Number AUD067130091				
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD KY 40068			U.S. EPA ID Number KYD053348108				
Facility's Phone: 502-845-2453							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. MIXTURE, (ISOPROPANOL), 3, PG II (D001)	024	DM	01320	G	D001
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information TSD:SMR 71209605 RA22126 CSB: 1)ERG#128; 24 HR EMERGENCY #1-800-468-1760 (SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name Brian Sellison		Signature 		Month 08		Day 18	Year 16
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit:		Date leaving U.S.:		
	17. Transporter Acknowledgment of Receipt of Materials						
DESIGNATED FACILITY	Transporter 1 Printed/Typed Name Joe Danay		Signature 		Month 08		Day 18
	Transporter 2 Printed/Typed Name Robbie D. Woods Inc.		Signature 		Month 9		Day 3
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H141 H261		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name M. Freeman		Signature 		Month 08		Day 10	Year 16

PLANT: DSV
GENERATOR NAME: Raining Rose

SAFETY-KLEEN
LDR NOTIFICATION FORM

08/17/2016 PAGE:1
10:20:47

MANIFEST NO.:
OR SALES SERVICE NO.:

SK Shipping #: 220040311

CUST#: RA22126

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: 1225549
SKDOT#: 7818178

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):

D001 LQ LIQUID >= 10% TUC

Treatability group: NNW Non-Waste Water

Waste Constituent Notification: None

NOTES

GENERATOR'S AUTHORIZED
SIGNATURE

PLANT: DSV

TOP COPY: GENERATOR

Brian Tellison

NAME & TITLE
(PRINTED OR TYPED)

CSG: REF#:

MIDDLE COPY: FACILITY

8 / 18 / 16
DATE

SW:
BOTTOM COPY: TRANSFER

DSV

SK SHIP# 221456584


 005832209 SKS
 Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAR000521807	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 005832209 SKS		
5. Generator's Name and Mailing Address Raining Rose 100 30th Street Drive Sou CEDAR RAPIDS Generator's Phone: 319-265-7167			Generator's Site Address (if different than mailing address) IA 52403-0000				
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.			U.S. EPA ID Number TXR000081205				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3035 WEST 73RD STREET DAVENPORT, IA 52806 Facility's Phone: 563-386-3024			U.S. EPA ID Number IAD098027592				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
		1. UNIVERSAL WASTE LAMPS NOT USDOT REGULATED	2 CF		600	P	NONE
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information TSD:DAV 72639440 RA22126 CSG:							
24 HR EMERGENCY #1-800-468-1760 (SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name Desiree Hansen		Signature 		Month Day Year 10/02/17			
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:				
	Transporter signature (for exports only):						
DESIGNATED FACILITY	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name Scott Gomes		Signature 		Month Day Year 10/02/17		
	Transporter 2 Printed/Typed Name		Signature		Month Day Year		
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: U.S. EPA ID Number						
	18b. Alternate Facility (or Generator)						
	Facility's Phone: Month Day Year						
18c. Signature of Alternate Facility (or Generator)							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. 2. 3. 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Joe Dancy		Signature 		Month Day Year 10/02/17			

DSV

SK SHIP# 220495175

270502012



005557297SKS

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAR000521807	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 005557297 SKS	
5. Generator's Name and Mailing Address Raining Rose 100 30th Street Drive Sou CEDAR RAPIDS 319-265-7167				Generator's Site Address (if different than mailing address) IA 52403-0000		
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.				U.S. EPA ID Number TXR000081205		
7. Transporter 2 Company Name <i>Union Gas Unit</i>				U.S. EPA ID Number <i>AP200026518</i>		
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD 502-845-2453				U.S. EPA ID Number KYD053348108		
Facility's Phone:						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
	X	1. RQ, UN1219, WASTE ISOPROPANOL, 3, PG I (D001)	02	DM	657	P
	X	2. UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. MIXTURE, (ISOPROPANOL), 3, PG II (D001)		DM		S
		3.				
		4.				
13. Waste Codes						
14. Special Handling Instructions and Additional Information TSD:SMR 71680941 RA22126 CSG: 22 1) ERG#129, 2) ERG#128, 24 HR EMERGENCY #1-800-468-1760 (SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name <i>Desiree Hansen</i>				Signature <i>[Signature]</i>		Month Day Year 10 07 16
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
	17. Transporter Acknowledgment of Receipt of Materials					
DESIGNATED FACILITY	Transporter 1 Printed/Typed Name <i>Jordan Fullerton</i>				Signature <i>[Signature]</i>	
	Transporter 2 Printed/Typed Name <i>Darow</i>				Signature <i>[Signature]</i>	
	18. Discrepancy				Month Day Year	
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				Manifest Reference Number: U.S. EPA ID Number	
18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)				Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. H141 HX01		2. H141		3.		4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
Printed/Typed Name <i>M. Freeman</i>				Signature <i>[Signature]</i>		Month Day Year 10 24 16

PLANT: DSV SAFETY-KLEEN 10/06/2016 PAGE:1
GENERATOR NAME: Raining Rose LDR NOTIFICATION FORM 09:35:48
SK Shipping #: 220495175 MANIFEST NO.: 005557797
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste
restricted under 40 CFR part 268 land disposal restrictions (LDR). CUST#: RA22126

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: ch1273875
SKDOT#: 7846189

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LG LIQUID >= 10% TOC
Treatability group: NNW Non-Waste Water
Waste Constituent Notification: None

~~LDR FORM LINE NO: 2 MANIFEST PAGE/LINE# 01/002 SKPRFL NO: 1225549
SKDOT#: 7818178~~

~~EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY):
D001 LG LIQUID >= 10% TOC
Treatability group: NNW Non-Waste Water
Waste Constituent Notification: None~~

NOTES


GENERATOR'S AUTHORIZED
SIGNATURE

PLANT: DSV
TOP COPY: GENERATOR

Desiree Hansen
NAME & TITLE

(PRINTED OR TYPED)

CSG: REF#: MIDDLE COPY: FACILITY

10 / 07 / 2016
DATE

SW: BOTTOM COPY: TRANSFER

DSV

SK SHIP# 221032946



0057152918KS

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IAR000521807	2. Page 1 of 1	3. Emergency Response Phone 1-800-468-1760	4. Manifest Tracking Number 005715291 SKS		
5. Generator's Name and Mailing Address Raining Rose 100 30th Street Drive Sou CEDAR RAPIDS IA 52403-0000			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC.			U.S. EPA ID Number TXR000081205				
7. Transporter 2 Company Name UNION GAS			U.S. EPA ID Number IAR000026518				
8. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068			U.S. EPA ID Number KYD053348100				
Facility's Phone: 502-845-2453							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	X	1. RQ, UN1219, WASTE ISOPROPANOL, 3, PG I (D001)	2	DM	600	5 P	D001
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information TSD:SMR 72259221 RA22126 CSG:							
1) ERG#129; 24 HR EMERGENCY #1-800-468-1760 (SK / TFI) AUTH AS "AGENT-EXP" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name Desiree Hansen		Signature 		Month 12		Day 12	
				Year 16			
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name Scott Gomez		Signature 		Month 12		Day 12	
				Year 16			
Transporter 2 Printed/Typed Name GARY Teague		Signature 		Month 12		Day 20	
				Year 16			
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____						
	Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator)						Month 12	
						Day 21	
						Year 16	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H1142/261		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Lony Kurtz		Signature 		Month 12		Day 21	
				Year 16			

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

1) 7846189/ch1271875

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Attachment 16 Page 1 of 2

PLANT: DSV SAFETY-KLEEN 12/06/2016 PAGE:1
GENERATOR NAME: Raining Rose LDR NOTIFICATION FORM 09:56:01
MANIFEST NO.: 0057152915K5
OR SALES SERVICE NO.:
SK Shipping #: 221032946 CUST#: RA22126
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste
restricted under 40 CFR part 268 land disposal restrictions (LDR).

A. GENERAL WASTE NOTIFICATION

LDR FORM LINE NO: 1 MANIFEST PAGE/LINE# 01/001 SKPRFL NO: ch1273075
EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY): SKDOT#: 7846189
D001 LQ LIQUID >= 10% TUC
Treatability group: NNW Non-Waste Water
Waste Constituent Notification: None

NOTES


GENERATOR'S AUTHORIZED
SIGNATURE

PLANT: DSV
TOP COPY: GENERATOR

Desiree Hansen
NAME & TITLE
(PRINTED OR TYPED)

CSG: REF#: MIDDLE COPY: FACILITY

12 / 12 / 2016
DATE

SW: BOTTOM COPY: TRANSFER

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION #

GENERATOR CODE (Assigned by Clean Harbors)

ADDRESS **100 30th Street Drive Southeast**

CUSTOMER CODE (Assigned by Clean Harbors)

ADDRESS **100 30th Street Drive Southeast**

IACESQG

RA22126

RA22126

GENERATOR NAME:

Raining Rose

CITY **Cedar Rapids**

STATE/PROVINCE **IA** ZIP/POSTAL CODE **52403**

PHONE: **(319) 265-7167**

CUSTOMER NAME:

Raining Rose

CITY **Cedar Rapids**

STATE/PROVINCE **IA** ZIP/POSTAL CODE **52403**

B. WASTE DESCRIPTION

WASTE DESCRIPTION: **Soybean Oil mixed with IPA and Bee's Wax**

PROCESS GENERATING WASTE: **Clean up of equipment and accidental contamination.**

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER? **No**

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE		NUMBER OF PHASES/LAYERS		VISCOSITY (If liquid present)		COLOR	
SOLID WITHOUT FREE LIQUID		<input checked="" type="checkbox"/> 1 2 3 TOP 99.00		1 - 100 (e.g. Water)		Varies	
POWDER		% BY VOLUME (Approx.) MIDDLE 0.00		<input checked="" type="checkbox"/> 101 - 500 (e.g. Motor Oil)			
MONOLITHIC SOLID		BOTTOM 1.00		501 - 10,000 (e.g. Molasses)			
<input checked="" type="checkbox"/> LIQUID WITH NO SOLIDS				> 10,000			
LIQUID/SOLID MIXTURE							
% FREE LIQUID 99.00 - 100.00		ODOR		BOILING POINT °F (°C)		MELTING POINT °F (°C)	
% SETTLED SOLID 0.00 - 1.00		NONE		<= 95 (<=35)		< 140 (<60)	
% TOTAL SUSPENDED SOLID 0.00 - 1.00		<input checked="" type="checkbox"/> MILD		95 - 100 (35-38)		140-200 (60-93)	
SLUDGE		STRONG		101 - 129 (38-54)		<input checked="" type="checkbox"/> > 200 (>93)	
GAS/AEROSOL		Describe:		<input checked="" type="checkbox"/> >= 130 (>54)		TOTAL ORGANIC CARBON	
						<= 1%	
						1-9%	
						<input checked="" type="checkbox"/> >= 10%	

FLASH POINT °F (°C)		pH	SPECIFIC GRAVITY		ASH		BTU/LB (MJ/kg)	
<input checked="" type="checkbox"/> < 73 (<23)		<= 2	< 0.8 (e.g. Gasoline)		< 0.1		< 2,000 (<4.6)	
73 - 100 (23-38)		2.1 - 6.9	<input checked="" type="checkbox"/> 0.8-1.0 (e.g. Ethanol)		0.1 - 1.0 <input checked="" type="checkbox"/> Unknown		2,000-5,000 (4.6-11.6)	
101 -140 (38-60)		<input checked="" type="checkbox"/> 7 (Neutral)	1.0 (e.g. Water)		1.1 - 5.0		5,000-10,000 (11.6-23.2)	
141 -200 (60-93)		7.1 - 12.4	1.0-1.2 (e.g. Antifreeze)		5.1 - 20.0		<input checked="" type="checkbox"/> > 10,000 (>23.2)	
> 200 (>93)		>= 12.5	> 1.2 (e.g. Methylene Chloride)				Actual:	

D. COMPOSITION (List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL	MIN	--	MAX	UOM
ISOPROPANOL	15.0000000	--	20.0000000	%
ORGANIC BEESWAX	1.0000000	--	3.0000000	%
SOYBEAN OIL	77.0000000	--	84.0000000	%

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES ☒ NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES ☒ NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING; ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES ☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material. YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste. YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS. YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED. YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE.

G39

SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. **W219**

F. REGULATORY STATUS

☒ YES NO USEPA HAZARDOUS WASTE?
D001

YES ☒ NO DO ANY STATE WASTE CODES APPLY?
Texas Waste Code

YES ☒ NO DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?

☒ YES NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
LDR CATEGORY: **This is subject to LDR.**
VARIANCE INFO:

YES ☒ NO IS THIS A UNIVERSAL WASTE?

YES NO IS THE GENERATOR OF THE WASTE CLASSIFIED AS CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)?

YES ☒ NO IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES ☒ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES NO IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

YES ☒ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS >=500 PPM?

YES ☒ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE >= .3KPA (.044 PSIA)?

YES ☒ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES ☒ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE ?

YES ☒ NO IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?
Hazardous Organic NESHAP (HON) rule (subpart G) Pharmaceuticals production (subpart GGG)

YES ☒ NO IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?

YES NO Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?

YES NO Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) >10 Mg/year?

What is the TAB quantity for your facility? Megagram/year (1 Mg = 2,200 lbs)

The basis for this determination is: Knowledge of the Waste Or Test Data Knowledge Testing

Describe the knowledge :

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S. MIXTURE, (ISOPROPNOL), 3, PG II (D001)

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY ONE TIME WEEKLY MONTHLY QUARTERLY ☒ YEARLY OTHER

<input checked="" type="checkbox"/> CONTAINERIZED		BULK LIQUID		BULK SOLID	
1-8 CONTAINERS/SHIPMENT		GALLONS/SHIPMENT: 0 Min -0 Max		SHIPMENT UOM: TON YARD	
STORAGE CAPACITY: 8				TONS/YARDS/SHIPMENT: 0 Min - 0 Max	
CONTAINER TYPE:					
PORTABLE TOTE TANK					
BOX/CARTON/CASE					
CUBIC YARD BOX					
<input checked="" type="checkbox"/> DRUM					
OTHER:					
DRUM SIZE: 55					

I. SPECIAL REQUEST

COMMENTS OR REQUESTS:

GENERATOR'S CERTIFICATION

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE <u>Mike Hicks</u>	NAME (PRINT) <u>Mike Hicks</u>	TITLE <u>Logistics Manager</u>	DATE <u>7-6-16</u>
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E. CONSTITUENTS

Are these values based on testing or knowledge? Knowledge Testing

If constituent concentrations are based on analytical testing, analysis must be provided. Please attach document(s) using the link on the Submit tab.

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>
D005	BARIUM	100.0				<input checked="" type="checkbox"/>
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>
D007	CHROMIUM	5.0				<input checked="" type="checkbox"/>
D008	LEAD	5.0				<input checked="" type="checkbox"/>
D009	MERCURY	0.2				<input checked="" type="checkbox"/>
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>
D011	SILVER	5.0				<input checked="" type="checkbox"/>
VOLATILE COMPOUNDS						
D018	BENZENE	0.5				<input checked="" type="checkbox"/>
D019	CARBON TETRACHLORIDE	0.5				<input checked="" type="checkbox"/>
D021	CHLOROGENE	100.0				<input checked="" type="checkbox"/>
D022	CHLOROFORM	6.0				<input checked="" type="checkbox"/>
D028	1,2-DICHLOROETHANE	0.5				<input checked="" type="checkbox"/>
D029	1,1-DICHLOROETHYLENE	0.7				<input checked="" type="checkbox"/>
D035	METHYL ETHYL KETONE	200.0				<input checked="" type="checkbox"/>
D039	TETRACHLOROETHYLENE	0.7				<input checked="" type="checkbox"/>
D040	TRICHLOROETHYLENE	0.5				<input checked="" type="checkbox"/>
D043	VINYL CHLORIDE	0.2				<input checked="" type="checkbox"/>
SEMI-VOLATILE COMPOUNDS						
D023	o-CRESOL	200.0				<input checked="" type="checkbox"/>
D024	m-CRESOL	200.0				<input checked="" type="checkbox"/>
D025	p-CRESOL	200.0				<input checked="" type="checkbox"/>
D026	CRESOL (TOTAL)	200.0				<input checked="" type="checkbox"/>
D027	1,4-DICHLOROBENZENE	7.5				<input checked="" type="checkbox"/>
D030	2,4-DINITROTOLUENE	0.13				<input checked="" type="checkbox"/>
D032	HEXACHLOROBENZENE	0.13				<input checked="" type="checkbox"/>
D033	HEXACHLOROBUTADIENE	0.5				<input checked="" type="checkbox"/>
D034	HEXACHLOROETHANE	3.0				<input checked="" type="checkbox"/>
D036	NITROBENZENE	2.0				<input checked="" type="checkbox"/>
D037	PENTACHLOROPHENOL	100.0				<input checked="" type="checkbox"/>
D038	PYRIDINE	5.0				<input checked="" type="checkbox"/>
D041	2,4,5-TRICHLOROPHENOL	400.0				<input checked="" type="checkbox"/>
D042	2,4,6-TRICHLOROPHENOL	2.0				<input checked="" type="checkbox"/>
PESTICIDES AND HERBICIDES						
D012	ENDRIN	0.02				<input checked="" type="checkbox"/>
D013	LINDANE	0.4				<input checked="" type="checkbox"/>
D014	METHOXYCHLOR	10.0				<input checked="" type="checkbox"/>
D015	TOXAPHENE	0.5				<input checked="" type="checkbox"/>
D016	2,4-D	10.0				<input checked="" type="checkbox"/>
D017	2,4,5-TP (SILVEX)	1.0				<input checked="" type="checkbox"/>
D020	CHLORDANE	0.03				<input checked="" type="checkbox"/>
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008				<input checked="" type="checkbox"/>

OTHER CONSTITUENTS	MAX	UOM	NOT APPLICABLE
BROMINE			<input checked="" type="checkbox"/>
CHLORINE			<input checked="" type="checkbox"/>
FLUORINE			<input checked="" type="checkbox"/>
IODINE			<input checked="" type="checkbox"/>
SULFUR			<input checked="" type="checkbox"/>
POTASSIUM			<input checked="" type="checkbox"/>
SODIUM			<input checked="" type="checkbox"/>
AMMONIA			<input checked="" type="checkbox"/>
CYANIDE AMENABLE			<input checked="" type="checkbox"/>
CYANIDE REACTIVE			<input checked="" type="checkbox"/>
CYANIDE TOTAL			<input checked="" type="checkbox"/>
SULFIDE REACTIVE			<input checked="" type="checkbox"/>

HOCs	PCBs
<input checked="" type="checkbox"/> NONE	<input checked="" type="checkbox"/> NONE
< 1000 PPM	< 50 PPM
>= 1000 PPM	>= 50 PPM
IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?	
YES <input checked="" type="checkbox"/> NO	

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCES
POLYMERIZABLE

EXPLOSIVE
RADIOACTIVE

FUMING
REACTIVE MATERIAL

OSHA REGULATED CARCINOGENS
☒ NONE OF THE ABOVE



WASTE MATERIAL PROFILE SHEET

Clean Harbors Profile No. CH1273875

A. GENERAL INFORMATION

GENERATOR EPA ID #/REGISTRATION # **IACESQG** GENERATOR NAME: **Raining Rose**
GENERATOR CODE (Assigned by Clean Harbors) **RA22126** CITY **Cedar Rapids** STATE/PROVINCE **IA** ZIP/POSTAL CODE **52403**
ADDRESS **100 30th Street Drive Southeast** PHONE: **(319) 265-7167**
CUSTOMER CODE (Assigned by Clean Harbors) **RA22126** CUSTOMER NAME: **Raining Rose**
ADDRESS **100 30th Street Drive Southeast** CITY **Cedar Rapids** STATE/PROVINCE **IA** ZIP/POSTAL CODE **52403**

B. WASTE DESCRIPTION

WASTE DESCRIPTION: **Isopropanol (IPA)**

PROCESS GENERATING WASTE: **Cleaning processing equipment.**

IS THIS WASTE CONTAINED IN SMALL PACKAGING CONTAINED WITHIN A LARGER SHIPPING CONTAINER? **No**

C. PHYSICAL PROPERTIES (at 25C or 77F)

PHYSICAL STATE SOLID WITHOUT FREE LIQUID POWDER MONOLITHIC SOLID <input checked="" type="checkbox"/> LIQUID WITH NO SOLIDS LIQUID/SOLID MIXTURE % FREE LIQUID % SETTLED SOLID % TOTAL SUSPENDED SOLID SLUDGE GAS/AEROSOL	NUMBER OF PHASES/LAYERS <input checked="" type="checkbox"/> 1 2 3 TOP 0.00 % BY VOLUME (Approx.) MIDDLE 0.00 BOTTOM 0.00		VISCOSITY (If liquid present) 1 - 100 (e.g. Water) <input checked="" type="checkbox"/> 101 - 500 (e.g. Motor Oil) 501 - 10,000 (e.g. Molasses) > 10,000		COLOR Varies			
	ODOR NONE <input checked="" type="checkbox"/> MILD STRONG Describe:		BOILING POINT °F (°C) ≤ 95 (≤35) 95 - 100 (35-38) 101 - 129 (38-54) <input checked="" type="checkbox"/> ≥ 130 (>54)			MELTING POINT °F (°C) < 140 (<60) 140-200 (60-93) > 200 (>93)	TOTAL ORGANIC CARBON ≤ 1% 1-9% <input checked="" type="checkbox"/> ≥ 10%	
	FLASH POINT °F (°C) <input checked="" type="checkbox"/> < 73 (<23) 73 - 100 (23-38) 101 - 140 (38-60) 141 - 200 (60-93) > 200 (>93)		pH ≤ 2 2.1 - 6.9 <input checked="" type="checkbox"/> 7 (Neutral) 7.1 - 12.4 ≥ 12.5	SPECIFIC GRAVITY <input checked="" type="checkbox"/> < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze) > 1.2 (e.g. Methylene Chloride)		ASH < 0.1 0.1 - 1.0 1.1 - 5.0 5.1 - 20.0 <input checked="" type="checkbox"/> > 20 Unknown	BTU/LB (MJ/kg) < 2,000 (<4.6) 2,000-5,000 (4.6-11.6) 5,000-10,000 (11.6-23.2) <input checked="" type="checkbox"/> > 10,000 (>23.2) Actual:	
	FLASH POINT °F (°C) <input checked="" type="checkbox"/> < 73 (<23) 73 - 100 (23-38) 101 - 140 (38-60) 141 - 200 (60-93) > 200 (>93)		pH ≤ 2 2.1 - 6.9 <input checked="" type="checkbox"/> 7 (Neutral) 7.1 - 12.4 ≥ 12.5	SPECIFIC GRAVITY <input checked="" type="checkbox"/> < 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze) > 1.2 (e.g. Methylene Chloride)		ASH < 0.1 0.1 - 1.0 1.1 - 5.0 5.1 - 20.0 <input checked="" type="checkbox"/> > 20 Unknown	BTU/LB (MJ/kg) < 2,000 (<4.6) 2,000-5,000 (4.6-11.6) 5,000-10,000 (11.6-23.2) <input checked="" type="checkbox"/> > 10,000 (>23.2) Actual:	

D. COMPOSITION (List the complete composition of the waste, include any inert components and/or debris. Ranges for individual components are acceptable. If a trade name is used, please supply an MSDS. Please do not use abbreviations.)

CHEMICAL

ISOPROPANOL

MIN -- MAX UOM
100.0000000 -- 100.0000000 %

DOES THIS WASTE CONTAIN ANY HEAVY GAUGE METAL DEBRIS OR OTHER LARGE OBJECTS (EX., METAL PLATE OR PIPING >1/4" THICK OR >12" LONG, METAL REINFORCED HOSE >12" LONG, METAL WIRE >12" LONG, METAL VALVES, PIPE FITTINGS, CONCRETE REINFORCING BAR OR PIECES OF CONCRETE >3")? YES NO

If yes, describe, including dimensions:

DOES THIS WASTE CONTAIN ANY METALS IN POWDERED OR OTHER FINELY DIVIDED FORM? YES ☒ NO

DOES THIS WASTE CONTAIN OR HAS IT CONTACTED ANY OF THE FOLLOWING: ANIMAL WASTES, HUMAN BLOOD, BLOOD PRODUCTS, BODY FLUIDS, MICROBIOLOGICAL WASTE, PATHOLOGICAL WASTE, HUMAN OR ANIMAL DERIVED SERUMS OR PROTEINS OR ANY OTHER POTENTIALLY INFECTIOUS MATERIAL? YES ☒ NO

I acknowledge that this waste material is neither infectious nor does it contain any organism known to be a threat to human health. This certification is based on my knowledge of the material. Select the answer below that applies:

The waste was never exposed to potentially infectious material.

YES NO

Chemical disinfection or some other form of sterilization has been applied to the waste.

YES NO

I ACKNOWLEDGE THAT THIS PROFILE MEETS THE CLEAN HARBORS BATTERY PACKAGING REQUIREMENTS.

YES NO

I ACKNOWLEDGE THAT MY FRIABLE ASBESTOS WASTE IS DOUBLE BAGGED AND WETTED.

YES NO

SPECIFY THE SOURCE CODE ASSOCIATED WITH THE WASTE.

G13

SPECIFY THE FORM CODE ASSOCIATED WITH THE WASTE. **W219**

Attachment 18 Page 1 of 3



E. CONSTITUENTS

Are these values based on testing or knowledge?

Knowledge

Testing

If constituent concentrations are based on analytical testing, analysis must be provided. Please attach document(s) using the link on the Submit tab.

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval of your waste profile. Please note that the total regulated metals and other constituents sections require answers.

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL	UOM	NOT APPLICABLE	
D004	ARSENIC	5.0				<input checked="" type="checkbox"/>	
D005	BARIUM	100.0				<input checked="" type="checkbox"/>	
D006	CADMIUM	1.0				<input checked="" type="checkbox"/>	
D007	CHROMIUM	5.0				<input checked="" type="checkbox"/>	
D008	LEAD	5.0				<input checked="" type="checkbox"/>	
D009	MERCURY	0.2				<input checked="" type="checkbox"/>	
D010	SELENIUM	1.0				<input checked="" type="checkbox"/>	
D011	SILVER	5.0				<input checked="" type="checkbox"/>	
VOLATILE COMPOUNDS				OTHER CONSTITUENTS	MAX	UOM	NOT APPLICABLE
D018	BENZENE	0.5		BROMINE			<input checked="" type="checkbox"/>
D019	CARBON TETRACHLORIDE	0.5		CHLORINE			<input checked="" type="checkbox"/>
D021	CHLOROBENZENE	100.0		FLUORINE			<input checked="" type="checkbox"/>
D022	CHLOROFORM	6.0		IODINE			<input checked="" type="checkbox"/>
D028	1,2-DICHLOROETHANE	0.5		SULFUR			<input checked="" type="checkbox"/>
D029	1,1-DICHLOROETHYLENE	0.7		POTASSIUM			<input checked="" type="checkbox"/>
D035	METHYL ETHYL KETONE	200.0		SODIUM			<input checked="" type="checkbox"/>
D039	TETRACHLOROETHYLENE	0.7		AMMONIA			<input checked="" type="checkbox"/>
D040	TRICHLOROETHYLENE	0.5		CYANIDE AMENABLE			<input checked="" type="checkbox"/>
D043	VINYL CHLORIDE	0.2		CYANIDE REACTIVE			<input checked="" type="checkbox"/>
SEMI-VOLATILE COMPOUNDS				CYANIDE TOTAL			<input checked="" type="checkbox"/>
D023	o-CRESOL	200.0		SULFIDE REACTIVE			<input checked="" type="checkbox"/>
D024	m-CRESOL	200.0					
D025	p-CRESOL	200.0					
D026	CRESOL (TOTAL)	200.0					
D027	1,4-DICHLOROBENZENE	7.5					
D030	2,4-DINITROTOLUENE	0.13					
D032	HEXACHLOROBENZENE	0.13					
D033	HEXACHLOROBUTADIENE	0.5					
D034	HEXACHLOROETHANE	3.0					
D036	NITROBENZENE	2.0					
D037	PENTACHLOROPHENOL	100.0					
D038	PYRIDINE	5.0					
D041	2,4,5-TRICHLOROPHENOL	400.0					
D042	2,4,6-TRICHLOROPHENOL	2.0					
PESTICIDES AND HERBICIDES							
D012	ENDRIN	0.02					
D013	LINDANE	0.4					
D014	METHOXYCHLOR	10.0					
D015	TOXAPHENE	0.5					
D016	2,4-D	10.0					
D017	2,4,5-TP (SILVEX)	1.0					
D020	CHLORDANE	0.03					
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008					

HOCs
☒ NONE
< 1000 PPM
=> 1000 PPM

PCBs
☒ NONE
< 50 PPM
=> 50 PPM
IF PCBs ARE PRESENT, IS THE WASTE REGULATED BY TSCA 40 CFR 761?
YES ☒ NO

ADDITIONAL HAZARDS

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED?

YES ☒ NO (If yes, explain)

CHOOSE ALL THAT APPLY

DEA REGULATED SUBSTANCES

EXPLOSIVE

FUMING

OSHA REGULATED CARCINOGENS

POLYMERIZABLE

RADIOACTIVE

REACTIVE MATERIAL

☒ NONE OF THE ABOVE



F. REGULATORY STATUS

☒ YES ☐ NO USEPA HAZARDOUS WASTE?
D001

YES ☒ NO DO ANY STATE WASTE CODES APPLY?
Texas Waste Code

YES ☒ NO DO ANY CANADIAN PROVINCIAL WASTE CODES APPLY?

☒ YES ☐ NO IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
LDR CATEGORY: **This is subject to LDR.**
VARIANCE INFO:

YES ☒ NO IS THIS A UNIVERSAL WASTE?

YES ☐ NO IS THE GENERATOR OF THE WASTE CLASSIFIED AS CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR (CESQG)?

YES ☒ NO IS THIS MATERIAL GOING TO BE MANAGED AS A RCRA EXEMPT COMMERCIAL PRODUCT, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?

YES ☒ NO DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

YES ☐ NO IS THIS WASTE STREAM SUBJECT TO THE INORGANIC METAL BEARING WASTE PROHIBITION FOUND AT 40 CFR 268.3(C)?

YES ☒ NO DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS ≥ 500 PPM?

YES ☒ NO DOES THE WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE $\geq .3$ KPA (.044 PSIA)?

YES ☒ NO DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE > 77 KPA (11.2 PSIA)?

YES ☒ NO IS THIS CERCLA REGULATED (SUPERFUND) WASTE?

YES ☒ NO IS THE WASTE SUBJECT TO ONE OF THE FOLLOWING NESHAP RULES?
Hazardous Organic NESHAP (HON) rule (subpart G) Pharmaceuticals production (subpart GGG)

YES ☒ NO IF THIS IS A US EPA HAZARDOUS WASTE, DOES THIS WASTE STREAM CONTAIN BENZENE?
YES ☐ NO Does the waste stream come from a facility with one of the SIC codes listed under benzene NESHAP or is this waste regulated under the benzene NESHAP rules because the original source of the waste is from a chemical manufacturing, coke by-product recovery, or petroleum refinery process?
YES ☐ NO Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) > 10 Mg/year?
What is the TAB quantity for your facility? Megagram/year (1 Mg = 2,200 lbs)
The basis for this determination is: Knowledge of the Waste Or Test Data Knowledge Testing
Describe the knowledge:

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

UN1219, WASTE ISOPROPANOL, 3, PG II (D001)

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY ONE TIME WEEKLY ☒ MONTHLY QUARTERLY YEARLY OTHER

<input checked="" type="checkbox"/> CONTAINERIZED		BULK LIQUID		BULK SOLID	
1-1	CONTAINERS/SHIPMENT	GALLONS/SHIPMENT: 0 Min - 0 Max	GAL.	SHIPMENT UOM:	TON YARD
STORAGE CAPACITY: 1				TONS/YARDS/SHIPMENT: 0 Min - 0 Max	
CONTAINER TYPE:					
PORTABLE TOTE TANK					
CUBIC YARD BOX					
OTHER:					
BOX/CARTON/CASE					
DRUM					
DRUM SIZE: 55					

I. SPECIAL REQUEST

COMMENTS OR REQUESTS:

GENERATOR'S CERTIFICATION

I certify that I am authorized to execute this document as an authorized agent. I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE

NAME (PRINT)

TITLE

DATE

Mike HicksMike HicksLogistics Manager8-17-16



HYDRITE CHEMICAL CO.

8622 N. 87th Street
Milwaukee, WI 53224
Main 855.365.7500
Fax 414.365.7450
www.hydrite.com

WASTE STREAM APPROVAL LETTER

4/15/15

RAINING ROSE, INC.
100 30TH STREET DR SE
CEDAR RAPIDS IA 52403

In accordance with 40 CFR 264.12(b) "Required Notice" and State(s) equivalent regulations, Hydrite Chemical Co. is informing the waste Generator that Hydrite Chemical Co. and our Vendors have appropriate permits for, and will accept the waste described below. This approval is based on the Waste Profile information provided by the Generator/Broker and/or the analytical results from the representative sample. Hydrite reserves the right to utilize waste management processes alternate to the Waste Management Code listed below.

Generator: RAINING ROSE
100 30TH STREET DR SE
CEDAR RAPIDS IA 52403
Contact: MIKE HICKS
Approved TSD: WRR
Profile Number: 142440 - EXPIRED FLAMMABLE LIQUIDS
DOT Shipping Name: WASTE FLAMMABLE LIQUID, N.O.S.
Hazard Class: 3
Packing Group: III UN/NA Id: UN1993 RQ: YES
RCRA Waste Codes: D001
Waste Mgmt Code:
Pricing: \$150.00/ EA
Minimum charges may apply

CUSTOMER PROCEDURES FOR PROCESS SHIPMENTS

1. When your material is ready for shipment, call Hydrite Customer Service. (855) 365-7509
Customer Service will issue an Authorization Number. The information needed to supply this number includes your Profile Number, the quantity to be shipped, date of shipment and any special information.
2. Hydrite requires that the Profile Number and the issued Authorization Number appear on the associated shipping document and on each container.
3. Hazardous Materials must be shipped in conformance with DOT regulations.

cc: MK Waste Coordinator
Account Rep 15



HYDRITE CHEMICAL CO.

142440

WASTE PROFILE PACKET

SALES REP. <i>Christensen</i>		BRANCH <i>Waterloo</i>		EPA I.D. NUMBER				
TSD FACILITY <i>WRR</i>		STATE I.D. NUMBER		GENERATOR STATUS <input type="checkbox"/> LQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> VSQG or CEG				
CUSTOMER BILL TO	CUSTOMER <i>Raining Rose, Inc</i>		ACCOUNT # <i>322288</i>		GENERATOR / PICK UP LOCATION <i>100 30th Street Dr SE</i>			
	ADDRESS <i>100 30th Street Dr SE</i>				CONTACT (REGULATORY / TECHNICAL) <i>Mike Hicks</i>		PHONE #	
	CITY <i>Cedar Rapids</i>		STATE <i>IA</i>	ZIP <i>52403</i>	MANIFEST ATTN. TO: <i>" "</i>		EMAIL	
	CONTACT 1 <i>Mike Hicks</i>		PHONE # <i>319-265-7167</i>		ADDRESS <i>100 30th Street Dr SE</i>			
	CONTACT 2 <i>Nick Bouzek</i>		PHONE # <i>319-265-7174</i>		CITY		STATE ZIP	
	24 HOUR EMERGENCY # <input checked="" type="checkbox"/> CHEMTEL <input type="checkbox"/> OTHER		EMAIL <i>mbouzek@rainingrose.com</i>		PICK UP INSTRUCTIONS			
		FAX# <i>Rose.com</i>		HOURS		LIFT GATE <input type="checkbox"/> Y <input type="checkbox"/> N	TRUCK PUMP <input type="checkbox"/> Y <input type="checkbox"/> N	HOSE LENGTH
				<input type="checkbox"/> VAPOR RECOVERY: CONNECTOR SIZE & TYPE:				

GENERATOR'S WASTE NAME: <i>Expired Flammable Liquids</i>				WASTE INFORMATION			
PROCESS GENERATING WASTE: <input type="checkbox"/> SPILL CLEANUP <input type="checkbox"/> LAB PACK <input type="checkbox"/> PAINTING <input type="checkbox"/> PRINTING <input type="checkbox"/> OFF-SPEC MATERIAL <input type="checkbox"/> CLEANING <input checked="" type="checkbox"/> UNUSED PRODUCT <input type="checkbox"/> OTHER:							
WASTE IS <input checked="" type="checkbox"/> VIRGIN <input type="checkbox"/> SPENT <input type="checkbox"/> DEGREASER				MANDATORY REPORTING CODES: SOURCE CODE <i>G11</i> FORM CODE <i>W219</i> MGMT CODE			
METHOD OF SHIPMENT <input checked="" type="checkbox"/> METAL DRUM <input type="checkbox"/> POLY DRUM <input type="checkbox"/> TOTES <input type="checkbox"/> PAIL <input type="checkbox"/> CUBIC BOX <input type="checkbox"/> BULK <input type="checkbox"/> OTHER							
QUANTITY <i>1 x 55g</i>		PER SHIPMENT <input type="checkbox"/> WK <input type="checkbox"/> MO <input type="checkbox"/> YR <input type="checkbox"/> ONE TIME <i>Quarterly</i>		TOTAL ANNUAL VOLUME <i>4 dr / year</i>			
SINGLE LAYER <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		TOTAL HALOGENS		PHYSICAL PROPERTIES @ 25°C (77°F)			
PHYSICAL STATE <i>100</i> % LIQUID				ODOR <input type="checkbox"/> NONE <input checked="" type="checkbox"/> MILD <input type="checkbox"/> STRONG		FLASHPOINT <input checked="" type="checkbox"/> ≤ 140° F <input type="checkbox"/> 141° - 200° F <input type="checkbox"/> > 200° F	
				Btu/Lb. <input type="checkbox"/> < 3,000 <input checked="" type="checkbox"/> 3,000 - 5,000 <input type="checkbox"/> > 5,000		pH <input type="checkbox"/> < 2.0 <input checked="" type="checkbox"/> 2.0 - 12.5 <input type="checkbox"/> > 12.5	
				EXACT		EXACT	
COMPOSITION OF WASTE		% RANGE		MAJOR SOLIDS COMPOSITION		HAZARDOUS PROPERTIES	
<i>Outdated/Expired Flavors 99-100 %</i>				<input type="checkbox"/> URETHANE <input type="checkbox"/> WASTE OIL		<input type="checkbox"/> NONE <input type="checkbox"/> PYROPHORIC	
<i>- attached SDS included -</i>				<input type="checkbox"/> SOIL <input type="checkbox"/> NITROCELLULOSE		<input type="checkbox"/> WATER REACTIVE <input type="checkbox"/> PESTICIDE INSECTICIDE	
				<input type="checkbox"/> EPOXY <input type="checkbox"/> RAGS/FILTERS		<input type="checkbox"/> SHOCK REACTIVE <input type="checkbox"/> OXIDIZER	
				<input type="checkbox"/> VINYL <input type="checkbox"/> OIL ABSORBANTS		<input type="checkbox"/> RADIOACTIVE <input type="checkbox"/> EXPLOSIVE	
				<input type="checkbox"/> METALS <input type="checkbox"/> CARBON		<input type="checkbox"/> CORROSIVE <input type="checkbox"/> POLYMERIZABLE	
				<input checked="" type="checkbox"/> OTHER (<i>None</i>)		<input type="checkbox"/> HERBICIDE <input type="checkbox"/> PATHOGEN	
				OTHER COMPONENTS		<input type="checkbox"/> BENZENE NESHAP <input type="checkbox"/> MARINE POLLUTANT	
				<input type="checkbox"/> CYANIDES <input type="checkbox"/> AMINES			
				<input type="checkbox"/> SULFIDES <input type="checkbox"/> PCB'S			
				<input type="checkbox"/> MONOMERS <input type="checkbox"/> PHENOLICS			
WATER				<input type="checkbox"/> ISOCYANATES			
TOTAL OF MAX. CONCENTRATION MUST BE ≥ 100%				<input checked="" type="checkbox"/> OTHER (<i>None</i>)			
						OTHER <input checked="" type="checkbox"/> MSDS ATTACHED (REQUIRED) <input type="checkbox"/> TCLP RESULTS ATTACHED <input type="checkbox"/> OTHER ANALYTICAL DATA ATTACHED	

HYDRITE COPY

Attachment 19 Page 2 of 3

142440

RCRA DETERMINATION				INORGANIC CHARACTERISTICS	
1. Is this material "Hazardous Waste" under 40CFR 261.3?				(Yes) No	Based on knowledge or analysis, provide an actual value or value for TCLP concentrations or total metal concentrations in ppm.
2. Is this a "Characteristic Waste"?				(Yes) No	
If "Yes" is it: <input checked="" type="checkbox"/> D001 Ignitable <input type="checkbox"/> D002 Corrosive <input type="checkbox"/> D003 Reactive					
<input type="checkbox"/> D004 - D043 Toxic, give specific codes: _____					
3. If this an "F" or a "K" listed waste or mixed with one?				Yes No	
If "yes" give the waste codes from 40CFR 261.31 and/or 261.32: _____					D004 Arsenic 5.0 _____
4. Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" listed waste code under 40CFR 261.33 (e) or (f)				Yes (No)	D005 Barium 100.0 _____
If "Yes" give the listed waste code: _____					D006 Cadmium 1.0 _____
5. Is this material exempt due to legitimate reclamation under 40 CFR 261.4 (a)(24)?				Yes (No)	D007 Chromium 5.0 _____
					D008 Lead 5.0 _____
					D009 Mercury 0.2 _____
					D010 Selenium 1.0 _____
					D011 Silver 5.0 _____
ORGANIC CHARACTERISTICS					
D012 Endrin	0.02	D023 o-Cresol	200.0	D034 Hexachloroethane	3.0
D013 Lindane	0.4	D024 m-Cresol	200.0	D035 Methyl Ethyl Ketone	200.0
D014 Methoxychlor	10.0	D025 p-Cresol	200.0	D036 Nitrobenzene	2.0
D015 Toxaphene	0.5	D026 Cresol	200.0	D037 Pentachlorophenol	100.0
D016 2, 4-Dichlorophenoxyacetic Acid	10.0	D027 1, 4-Dichlorobenzene	7.5	D038 Pyridine	5.0
D017 2, 4, 5-TP (Silvex)	1.0	D028 1, 2-Dichloroethane	0.5	D039 Tetrachloroethylene	0.7
D018 Benzene	0.5	D029 1, 1-Dichloroethylene	0.7	D040 Trichloroethylene	0.5
D019 Carbon Tetrachloride	0.5	D030 2, 4-Dinitrotoluene	0.13	D041 2, 4, 5-Trichlorophenol	400.0
D020 Chlordane	0.03	D031 Heptachlor (and it's epoxide)	0.008	D042 2, 4, 6-Trichlorophenol	2.0
D021 Chlorobenzene	100.0	D032 Hexachlorobenzene	0.13	D043 Vinyl Chloride	0.2
D022 Chloroform	6.0	D033 Hexachlorobutadiene	0.5		
DOT CHARACTERIZATION					
UN/NA #		PROPER SHIPPING NAME		HAZARD CLASS	PACKING GROUP
TWO PRIMARY HAZARDOUS CONSTITUENTS					RQ #
CUSTOM RECYCLE - SAMPLE REQUIRED					
RECYCLE TYPE			HOW CURED		
<input type="checkbox"/> INK <input type="checkbox"/> PAINT <input type="checkbox"/> OTHER _____			<input type="checkbox"/> ULTRAVIOLET <input type="checkbox"/> CATALYTIC <input type="checkbox"/> HEAT (TEMP.) _____		
RECYCLE APPLICATION					
RETURN SPECIFICATIONS, REQUIRED					
SPECIAL RETURN INSTRUCTIONS					
<input type="checkbox"/> DRUMS <input type="checkbox"/> BULK <input type="checkbox"/> TOTE			IF DRUMS, <input type="checkbox"/> RECON/LINED <input type="checkbox"/> NEW/LINED <input type="checkbox"/> OTHER _____		
<input type="checkbox"/> FULL TANKER; UNLOAD			<input type="checkbox"/> CENTER <input type="checkbox"/> REAR <input type="checkbox"/> DOES NOT MATTER		
IF BULK, MAXIMUM RETURN QUANTITY: _____					
SAMPLE CHAIN OF CUSTODY					
DATE COLLECTED		TIME COLLECTED		PLACE COLLECTED	
				AM PM	
COLLECTED BY (PRINT NAME)				SIGNATURE	
ADDITIONAL SERVICES REQUESTED					
DO YOU WANT HYDRITE TO PREPARE SHIPPING FORMS (i.e. MANIFEST, LAND, BAN, LABELS)?					(YES) NO
DO YOU WANT HYDRITE'S 24 EMERGENCY RESPONSE?					(YES) NO
IF YOU ANSWERED YES, REFER TO THE TERMS AND CONDITIONS OF SALE.					
GENERATOR CERTIFICATION STATEMENT					
I hereby certify that all the information, to the best of my knowledge, on this and any attached documents, is complete, correct, and that all known hazards are accurate and have been disclosed. If this waste changes in any manner, Hydrite will immediately be notified in writing.					
Mike Hicks Raining Rose		Miki		4-8-15	
GENERATOR NAME		GENERATOR SIGNATURE		Attachment 19 Page 3 PQ# 3	



8622 N. 87th Street
Milwaukee, WI 53224
Main 855.365.7500
Fax 414.365.7450
www.hydrite.com

WASTE STREAM APPROVAL LETTER

6/12/15

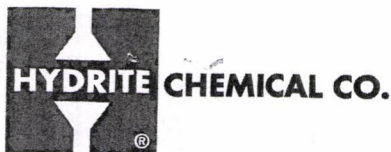
RAINING ROSE, INC.
100 30TH STREET DR SE
CEDAR RAPIDS IA 52403

In accordance with 40 CFR 264.12(b) "Required Notice" and State(s) equivalent regulations, Hydrite Chemical Co. is informing the waste Generator that Hydrite Chemical Co. and our Vendors have appropriate permits for, and will accept the waste described below. This approval is based on the Waste Profile information provided by the Generator/Broker and/or the analytical results from the representative sample. Hydrite reserves the right to utilize waste management processes alternate to the Waste Management Code listed below.

Generator: RAINING ROSE
100 30TH STREET DR SE
CEDAR RAPIDS IA 52403
Contact: Mike Hicks
Approved TSD: WRR
Profile Number: 143362 - HAZARDOUS POWDER - LYE
DOT Shipping Name: SODIUM HYDROXIDE, SOLID
Hazard Class: 8
Packing Group: II UN/NA Id: UN1823 RQ: NO
RCRA Waste Codes: NRM
Waste Mgmt Code:
Pricing: \$275.000/EA
Minimum charges may apply

CUSTOMER PROCEDURES FOR PROCESS SHIPMENTS

1. When your material is ready for shipment, call Hydrite Customer Service. Customer Service will issue an Authorization Number. The information needed to supply this number includes your Profile Number, the quantity to be shipped, date of shipment and any special information.
 2. Hydrite requires that the Profile Number and the issued Authorization Number appear on the associated shipping document and on each container.
 3. Hazardous Materials must be shipped in conformance with DOT regulations.
- cc: MK Waste Coordinator
Account Rep 15



143352

WASTE PROFILE PACKET

SALES REP.		BRANCH		EPA I.D. NUMBER										
Christensen		Waterloo												
TSD FACILITY		STATE I.D. NUMBER		GENERATOR STATUS										
				<input type="checkbox"/> LQG <input type="checkbox"/> SQG <input checked="" type="checkbox"/> VSQG or CEG										
CUSTOMER BILL TO	CUSTOMER		ACCOUNT #		GENERATOR / PICK UP LOCATION									
	Raining Rose		322288		100 30th Street Drive SE									
	ADDRESS				CONTACT (REGULATORY / TECHNICAL)									
	100 30th St Dr SE				Mike Hicks									
	CITY		STATE ZIP		MANIFEST ATTN. TO:									
	Cedar Rapids, IA		52403		100 30th Street Drive SE									
CONTACT 1		PHONE #		ADDRESS										
Mike Hicks		319-265-7167		"										
CONTACT 2		PHONE #		CITY										
Desiree Hansen		319-265-7174		Cedar Rapids										
24 HOUR EMERGENCY #		FAX #		STATE ZIP										
<input checked="" type="checkbox"/> CHEMTEL		Rose.com		IA 52403										
<input type="checkbox"/> OTHER				PICK UP INSTRUCTIONS										
				HOURS LIFT GATE TRUCK PUMP HOSE LENGTH										
				<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Y <input type="checkbox"/> N										
				<input type="checkbox"/> VAPOR RECOVERY: CONNECTOR SIZE & TYPE:										
WASTE INFORMATION														
GENERATOR'S WASTE NAME:														
Hazardous Powder-Lye (partial Bag in a drum)														
PROCESS GENERATING WASTE:														
<input type="checkbox"/> SPILL CLEANUP <input type="checkbox"/> LAB PACK <input type="checkbox"/> PAINTING <input type="checkbox"/> PRINTING <input type="checkbox"/> CLEANING <input checked="" type="checkbox"/> UNUSED PRODUCT														
<input type="checkbox"/> OFF-SPEC MATERIAL <input type="checkbox"/> OTHER:														
WASTE IS														
<input checked="" type="checkbox"/> VIRGIN <input type="checkbox"/> SPENT <input type="checkbox"/> DEGREASER														
MANDATORY REPORTING CODES:														
METHOD OF SHIPMENT														
<input checked="" type="checkbox"/> METAL DRUM <input type="checkbox"/> POLY DRUM <input type="checkbox"/> TOTES <input type="checkbox"/> PAIL <input type="checkbox"/> CUBIC BOX <input type="checkbox"/> BULK <input type="checkbox"/> OTHER														
QUANTITY														
1 x 55g drum														
PER SHIPMENT														
<input type="checkbox"/> WK <input type="checkbox"/> MO <input type="checkbox"/> YR <input checked="" type="checkbox"/> ONE TIME														
TOTAL ANNUAL VOLUME														
~ 1 drum														
PHYSICAL PROPERTIES @ 25° C (77°F)														
SINGLE LAYER														
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO														
TOTAL HALOGENS														
%														
ODOR														
<input type="checkbox"/> NONE <input checked="" type="checkbox"/> MILD <input type="checkbox"/> STRONG														
PHYSICAL STATE														
Btu/Lb.														
pH														
FLASHPOINT														
% LIQUID														
% SLUDGE														
% SOLID														
100 % POWDER														
% OTHER (DESCRIBE)														
COMPOSITION OF WASTE		% RANGE		MAJOR SOLIDS COMPOSITION				HAZARDOUS PROPERTIES						
Sodium Hydroxide		99-100 %		<input type="checkbox"/> URETHANE <input type="checkbox"/> WASTE OIL				<input type="checkbox"/> NONE <input type="checkbox"/> PYROPHORIC						
		%		<input type="checkbox"/> SOIL <input type="checkbox"/> NITROCELLULOSE				<input type="checkbox"/> WATER REACTIVE <input type="checkbox"/> PESTICIDE INSECTICIDE						
		%		<input type="checkbox"/> EPOXY <input type="checkbox"/> RAGS/FILTERS				<input type="checkbox"/> SHOCK REACTIVE <input type="checkbox"/> OXIDIZER						
		%		<input type="checkbox"/> VINYL <input type="checkbox"/> OIL ABSORBANTS				<input type="checkbox"/> RADIOACTIVE <input type="checkbox"/> EXPLOSIVE						
		%		<input type="checkbox"/> METALS <input type="checkbox"/> CARBON				<input checked="" type="checkbox"/> CORROSIVE <input type="checkbox"/> POLYMERIZABLE						
		%		<input checked="" type="checkbox"/> OTHER (Caustic powder)				<input type="checkbox"/> HERBICIDE <input type="checkbox"/> PATHOGEN						
		%		OTHER COMPONENTS				<input type="checkbox"/> BENZENE NESHAP <input type="checkbox"/> MARINE POLLUTANT						
		%		<input type="checkbox"/> CYANIDES <input type="checkbox"/> AMINES				<input type="checkbox"/> AIR REACTIVE						
		%		<input type="checkbox"/> SULFIDES <input type="checkbox"/> PCB'S										
		%		<input type="checkbox"/> MONOMERS <input type="checkbox"/> PHENOLICS										
WATER		%		<input type="checkbox"/> ISOCYNATES				OTHER						
TOTAL OF MAX. CONCENTRATION MUST BE ≥ 100%		%		<input type="checkbox"/> OTHER (None)				<input checked="" type="checkbox"/> MSDS ATTACHED (REQUIRED)						
								<input type="checkbox"/> TCLP RESULTS ATTACHED						
								<input type="checkbox"/> OTHER ANALYTICAL DATA ATTACHED						

143362

RCRA DETERMINATION

1. Is this material "Hazardous Waste" under 40CFR 261.3? Yes ☒ No ☐
 2. Is this a "Characteristic Waste"? Yes ☒ No ☐
 If "Yes" is it: ☐ D001 Ignitable ☒ D002 Corrosive ☐ D003 Reactive
☐ D004 - D043 Toxic, give specific codes: _____
 3. If this an "F" or a "K" listed waste or mixed with one? Yes ☐ No ☒
 If "yes" give the waste codes from 40CFR 261.31 and/or 261.32: _____
 4. Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" listed waste code under 40CFR 261.33 (e) or (f) Yes ☐ No ☒
 If "Yes" give the listed waste code: _____
 5. Is this material exempt due to legitimate reclamation under 40 CFR 261.4 (a)(24)? Yes ☐ No ☒

INORGANIC CHARACTERISTICS

Based on knowledge or analysis, provide an actual value or value for TCLP concentrations or total metal concentrations in ppm.

D004 Arsenic 5.0 _____
 D005 Barium 100.0 _____
 D006 Cadmium 1.0 _____
 D007 Chromium 5.0 _____
 D008 Lead 5.0 _____
 D009 Mercury 0.2 _____
 D010 Selenium 1.0 _____
 D011 Silver 5.0 _____

ORGANIC CHARACTERISTICS

D012 Endrin	0.02	_____	D023 o-Cresol	200.0	_____	D034 Hexachloroethane	3.0	_____
D013 Lindane	0.4	_____	D024 m-Cresol	200.0	_____	D035 Methyl Ethyl Ketone	200.0	_____
D014 Methoxychlor	10.0	_____	D025 p-Cresol	200.0	_____	D036 Nitrobenzene	2.0	_____
D015 Toxaphene	0.5	_____	D026 Cresol	200.0	_____	D037 Pentachlorophenol	100.0	_____
D016 2, 4-Dichlorophenoxyacetic Acid	10.0	_____	D027 1, 4-Dichlorobenzene	7.5	_____	D038 Pyridine	5.0	_____
D017 2, 4, 5-TP (Silvex)	1.0	_____	D028 1, 2-Dichloroethane	0.5	_____	D039 Tetrachloroethylene	0.7	_____
D018 Benzene	0.5	_____	D029 1, 1-Dichloroethylene	0.7	_____	D040 Trichloroethylene	0.5	_____
D019 Carbon Tetrachloride	0.5	_____	D030 2, 4-Dinitrotoluene	0.13	_____	D041 2, 4, 5-Trichlorophenol	400.0	_____
D020 Chlordane	0.03	_____	D031 Heptachlor (and it's epoxide)	0.008	_____	D042 2, 4, 6-Trichlorophenol	2.0	_____
D021 Chlorobenzene	100.0	_____	D032 Hexachlorobenzene	0.13	_____	D043 Vinyl Chloride	0.2	_____
D022 Chloroform	6.0	_____	D033 Hexachlorobutadiene	0.5	_____			

DOT CHARACTERIZATION

UN/NA #	PROPER SHIPPING NAME	HAZARD CLASS	PACKING GROUP
TWO PRIMARY HAZARDOUS CONSTITUENTS			RQ #

CUSTOM RECYCLE - SAMPLE REQUIRED

RECYCLE TYPE HOW CURED
☐ INK ☐ PAINT ☐ OTHER _____ ☐ ULTRAVIOLET ☐ CATALYTIC ☐ HEAT (TEMP.) _____

RECYCLE APPLICATION

RETURN SPECIFICATIONS, REQUIRED

SPECIAL RETURN INSTRUCTIONS

☐ DRUMS ☐ BULK ☐ TOTE IF DRUMS, ☐ RECON/LINED ☐ NEW/LINED ☐ OTHER _____
☐ FULL TANKER; UNLOAD ☐ CENTER ☐ REAR ☐ DOES NOT MATTER
 IF BULK, MAXIMUM RETURN QUANTITY: _____

SAMPLE CHAIN OF CUSTODY

DATE COLLECTED	TIME COLLECTED	PLACE COLLECTED
	AM PM	

COLLECTED BY (PRINT NAME)	SIGNATURE

ADDITIONAL SERVICES REQUESTED

DO YOU WANT HYDRITE TO PREPARE SHIPPING FORMS (i.e. MANIFEST, LAND, BAN, LABELS)?

YES ☒ NO ☐

DO YOU WANT HYDRITE'S 24 EMERGENCY RESPONSE?

YES ☒ NO ☐

IF YOU ANSWERED YES, REFER TO THE TERMS AND CONDITIONS OF SALE.

GENERATOR CERTIFICATION STATEMENT

I hereby certify that all the information, to the best of my knowledge, on this and any attached documents, is complete, correct, and that all known hazards are accurate and have been disclosed. If this waste changes in any manner, Hydrite will immediately be notified in writing.

Mike Hick Rainins Rose
 GENERATOR NAME

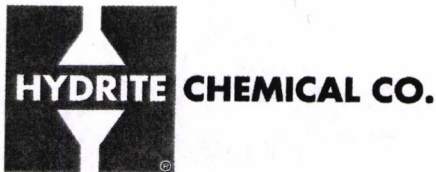
Mike Hick
 GENERATOR SIGNATURE

5-29-15
 DATE

PO #

HYDRITE COPY

Attachment 2 Page 3 of 3
 1-800A11 (4-1-09, REV. 5)



8622 N. 87th Street
Milwaukee, WI 53224
Main 855.365.7500
Fax 414.365.7450
www.hydrite.com

WASTE STREAM APPROVAL LETTER

4/16/15

RAINING ROSE, INC.
100 30TH STREET DR SE
CEDAR RAPIDS IA 52403

In accordance with 40 CFR 264.12(b) "Required Notice" and State(s) equivalent regulations, Hydrite Chemical Co. is informing the waste Generator that Hydrite Chemical Co. and our Vendors have appropriate permits for, and will accept the waste described below. This approval is based on the Waste Profile information provided by the Generator/Broker and/or the analytical results from the representative sample. Hydrite reserves the right to utilize waste management processes alternate to the Waste Management Code listed below.

Generator: RAINING ROSE
100 30TH STREET DR SE
CEDAR RAPIDS IA 52403
Contact: KAREN EDWARDS
Approved TSD: WRR
Profile Number: 142448 - HPLC CHEMICALS
DOT Shipping Name: WASTE FLAMMABLE LIQUID, N.O.S.
(ACETONITRILE, ETHYL ETHER)
Hazard Class: 3
Packing Group: UN/NA Id: RQ: YES
RCRA Waste Codes: D001
Waste Mgmt Code:
Pricing: \$265.0000/EA
Minimum charges may apply

CUSTOMER PROCEDURES FOR PROCESS SHIPMENTS

1. When your material is ready for shipment, call Hydrite Customer Service. 855-365-7509
Customer Service will issue an Authorization Number. The information needed to supply this number includes your Profile Number, the quantity to be shipped, date of shipment and any special information.
 2. Hydrite requires that the Profile Number and the issued Authorization Number appear on the associated shipping document and on each container.
 3. Hazardous Materials must be shipped in conformance with DOT regulations.
 4. ** Note 5 gal pails must be put in a 55 gallon open top drum due to Flammable Nature when shipping material.*
- cc: MK Waste Coordinator
Account Rep 15

Providing Creative Solutions

WASTE PROFILE PACKET

SALES REP. Christensen		BRANCH Waterloo		EPA I.D. NUMBER			
TSD FACILITY WRP		STATE I.D. NUMBER		GENERATOR STATUS			
				<input type="checkbox"/> LQG <input type="checkbox"/> SQG <input type="checkbox"/> VSQG or CEG			
CUSTOMER BILL TO	CUSTOMER Raining Rose, Inc		ACCOUNT # 322288		GENERATOR / PICK UP LOCATION 100 30th Street Dr SE		
	ADDRESS 100 30th Street Dr SE				CONTACT (REGULATORY / TECHNICAL)		
	CITY Cedar Rapids		STATE IA		PHONE #		
	CONTACT 1 Karen Edwards		ZIP 52403		EMAIL		
	CONTACT 2 Mike Hicks		PHONE # 319-265-7167		MANIFEST ATTN. TO:		
	24 HOUR EMERGENCY # <input checked="" type="checkbox"/> CHEMTEL <input type="checkbox"/> OTHER		EMAIL kedwards@rainingrose.com mhicks@rainingrose.com		FAX# Rose.com		

WASTE INFORMATION

GENERATOR'S WASTE NAME: HPLC Chemicals			
PROCESS GENERATING WASTE:			
<input type="checkbox"/> SPILL CLEANUP <input type="checkbox"/> LAB PACK <input type="checkbox"/> OFF-SPEC MATERIAL <input type="checkbox"/> PAINTING <input type="checkbox"/> PRINTING <input type="checkbox"/> CLEANING <input type="checkbox"/> UNUSED PRODUCT			
WASTE IS			
<input type="checkbox"/> VIRGIN <input checked="" type="checkbox"/> SPENT <input type="checkbox"/> DEGREASER <input type="checkbox"/> OTHER: <u>analytical lab</u>			
METHOD OF SHIPMENT			
<input type="checkbox"/> METAL DRUM <input type="checkbox"/> POLY DRUM <input type="checkbox"/> TOTES <input checked="" type="checkbox"/> 5 gal PAIL <input type="checkbox"/> CUBIC BOX <input type="checkbox"/> BULK <input type="checkbox"/> OTHER			
QUANTITY 2x5g		PER SHIPMENT	
		<input type="checkbox"/> WK <input type="checkbox"/> MO <input checked="" type="checkbox"/> YR <input type="checkbox"/> ONE TIME	
		TOTAL ANNUAL VOLUME	

PHYSICAL PROPERTIES @ 25° C (77°F)

SINGLE LAYER <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		TOTAL HALOGENS		ODOR <input type="checkbox"/> NONE <input checked="" type="checkbox"/> MILD <input type="checkbox"/> STRONG	
PHYSICAL STATE		FLASHPOINT		pH	
100 % LIQUID		<input checked="" type="checkbox"/> ≤ 140° F		<input checked="" type="checkbox"/> < 2.0	
_____ % SOLID		<input type="checkbox"/> 141° - 200° F		<input checked="" type="checkbox"/> 2.0 - 12.5	
_____ % OTHER (DESCRIBE)		<input type="checkbox"/> > 200° F		<input type="checkbox"/> > 12.5	

COMPOSITION OF WASTE	% RANGE	MAJOR SOLIDS COMPOSITION	HAZARDOUS PROPERTIES
Acetonitrile	58-60 %	<input type="checkbox"/> URETHANE <input type="checkbox"/> WASTE OIL <input type="checkbox"/> SOIL <input type="checkbox"/> NITROCELLULOSE <input type="checkbox"/> EPOXY <input type="checkbox"/> RAGS/FILTERS <input type="checkbox"/> VINYL <input type="checkbox"/> OIL ABSORBANTS <input type="checkbox"/> METALS <input type="checkbox"/> CARBON <input checked="" type="checkbox"/> OTHER (None)	<input type="checkbox"/> NONE <input type="checkbox"/> PYROPHORIC <input type="checkbox"/> WATER REACTIVE <input type="checkbox"/> PESTICIDE INSECTICIDE <input type="checkbox"/> SHOCK REACTIVE <input type="checkbox"/> OXIDIZER <input type="checkbox"/> RADIOACTIVE <input type="checkbox"/> EXPLOSIVE <input type="checkbox"/> CORROSIVE <input type="checkbox"/> POLYMERIZABLE <input type="checkbox"/> HERBICIDE <input type="checkbox"/> PATHOGEN <input type="checkbox"/> BENZENE NESHAP <input type="checkbox"/> MARINE POLLUTANT <input type="checkbox"/> AIR REACTIVE
Methanol	28-30 %	OTHER COMPONENTS <input type="checkbox"/> CYANIDES <input type="checkbox"/> AMINES <input type="checkbox"/> SULFIDES <input type="checkbox"/> PCB'S <input type="checkbox"/> MONOMERS <input type="checkbox"/> PHENOLICS <input type="checkbox"/> ISOCYANATES <input type="checkbox"/> OTHER (None)	<input checked="" type="checkbox"/> MSDS ATTACHED (REQUIRED) <input type="checkbox"/> TCLP RESULTS ATTACHED <input type="checkbox"/> OTHER ANALYTICAL DATA ATTACHED
Ethyl Ether	8-10 %		
	— %		
	— %		
	— %		
WATER	0-5 %		
TOTAL OF MAX. CONCENTRATION MUST BE ≥ 100%			

142448

RCRA DETERMINATION				INORGANIC CHARACTERISTICS	
Is this material "Hazardous Waste" under 40CFR 261.3? Yes <input checked="" type="radio"/> No <input type="radio"/> Is this a "Characteristic Waste"? Yes <input checked="" type="radio"/> No <input type="radio"/> If "Yes" is it: <input checked="" type="checkbox"/> D001 Ignitable <input type="checkbox"/> D002 Corrosive <input type="checkbox"/> D003 Reactive <input type="checkbox"/> D004 - D043 Toxic, give specific codes: _____ 3. If this an "F" or a "K" listed waste or mixed with one? Yes <input checked="" type="radio"/> No <input type="radio"/> If "yes" give the waste codes from 40CFR 261.31 and/or 261.32: _____ 4. Is this a commercial chemical product or spill cleanup that would carry a "U" or "P" listed waste code under 40CFR 261.33 (e) or (f) Yes <input type="radio"/> No <input checked="" type="radio"/> If "Yes" give the listed waste code: _____ 5. Is this material exempt due to legitimate reclamation under 40 CFR 261.4 (a)(24)? Yes <input type="radio"/> No <input checked="" type="radio"/>				Based on knowledge or analysis, provide an actual value or value for TCLP concentrations or total metal concentrations in ppm. D004 Arsenic 5.0 _____ D005 Barium 100.0 _____ D006 Cadmium 1.0 _____ D007 Chromium 5.0 _____ D008 Lead 5.0 _____ D009 Mercury 0.2 _____ D010 Selenium 1.0 _____ D011 Silver 5.0 _____	
ORGANIC CHARACTERISTICS					
D012 Endrin	0.02	D023 o-Cresol	200.0	D034 Hexachloroethane	3.0
D013 Lindane	0.4	D024 m-Cresol	200.0	D035 Methyl Ethyl Ketone	200.0
D014 Methoxychlor	10.0	D025 p-Cresol	200.0	D036 Nitrobenzene	2.0
D015 Toxaphene	0.5	D026 Cresol	200.0	D037 Pentachlorophenol	100.0
D016 2, 4-Dichlorophenoxyacetic Acid	10.0	D027 1, 4-Dichlorobenzene	7.5	D038 Pyridine	5.0
D017 2, 4, 5-TP (Silvex)	1.0	D028 1, 2-Dichloroethane	0.5	D039 Tetrachloroethylene	0.7
D018 Benzene	0.5	D029 1, 1-Dichloroethylene	0.7	D040 Trichloroethylene	0.5
D019 Carbon Tetrachloride	0.5	D030 2, 4-Dinitrotoluene	0.13	D041 2, 4, 5-Trichlorophenol	400.0
D020 Chlordane	0.03	D031 Heptachlor (and it's epoxide)	0.008	D042 2, 4, 6-Trichlorophenol	2.0
D021 Chlorobenzene	100.0	D032 Hexachlorobenzene	0.13	D043 Vinyl Chloride	0.2
D022 Chloroform	6.0	D033 Hexachlorobutadiene	0.5		
DOT CHARACTERIZATION					
UN/NA #		PROPER SHIPPING NAME		HAZARD CLASS	PACKING GROUP
TWO PRIMARY HAZARDOUS CONSTITUENTS					RQ #
CUSTOM RECYCLE - SAMPLE REQUIRED					
RECYCLE TYPE <input type="checkbox"/> INK <input type="checkbox"/> PAINT <input type="checkbox"/> OTHER _____			HOW CURED <input type="checkbox"/> ULTRAVIOLET <input type="checkbox"/> CATALYTIC <input type="checkbox"/> HEAT (TEMP.) _____		
RECYCLE APPLICATION					
RETURN SPECIFICATIONS, REQUIRED					
SPECIAL RETURN INSTRUCTIONS					
<input type="checkbox"/> DRUMS <input type="checkbox"/> BULK <input type="checkbox"/> TOTE <input type="checkbox"/> FULL TANKER; UNLOAD		IF DRUMS, <input type="checkbox"/> RECON/LINED <input type="checkbox"/> NEW/LINED <input type="checkbox"/> OTHER _____ <input type="checkbox"/> CENTER <input type="checkbox"/> REAR <input type="checkbox"/> DOES NOT MATTER			
IF BULK, MAXIMUM RETURN QUANTITY: _____					
SAMPLE CHAIN OF CUSTODY					
DATE COLLECTED	TIME COLLECTED	PLACE COLLECTED			
COLLECTED BY (PRINT NAME)		SIGNATURE			
ADDITIONAL SERVICES REQUESTED					
DO YOU WANT HYDRITE TO PREPARE SHIPPING FORMS (i.e. MANIFEST, LAND, BAN, LABELS)?					YES <input checked="" type="radio"/> NO <input type="radio"/>
DO YOU WANT HYDRITE'S 24 EMERGENCY RESPONSE?					YES <input checked="" type="radio"/> NO <input type="radio"/>
IF YOU ANSWERED YES, REFER TO THE TERMS AND CONDITIONS OF SALE.					
GENERATOR CERTIFICATION STATEMENT					
I hereby certify that all the information, to the best of my knowledge, on this and any attached documents, is complete, correct, and that all known hazards are accurate and have been disclosed. If this waste changes in any manner, Hydrite will immediately be notified in writing.					
Mike Hicks		Reinins Rose		4-8-15	
GENERATOR NAME		GENERATOR SIGNATURE		DATE	
Attachment 21 Page 3 of 3					

HYDRITE COPY

1-800AH (4-1-09, REV. 5)

Certificate of Achievement

HWMC

This certificate has been awarded to:

Michael John Hicks

at

Cedar Rapids, IA area

Session# 16765

For successful completion of Lion Technology's two-day RCRA Hazardous Waste Management Workshop. This training is designed for managers and supervisors of hazardous waste compliance activities at both large and small quantity generator sites [40 CFR 262.34(a)(4), 265.16, and 262.34(d)(5)(iii)].

Successful completion includes attaining a passing grade on the final proficiency test. The US EPA requires annual retraining for hazardous waste personnel working at large quantity generator sites and TSDFs [40 CFR 262.34(a)(4) and 265.16]. Training was conducted by Lion Technology Inc., 570 Lafayette Road, Sparta, NJ 07871 (973-383-0800).

*This training completed on: **September 16, 2016***

Lion Technology Member PIN: 7081731

1.4 CEUs, NEHA Authorized CE Contact Hours:14

Noah Polsky
INSTRUCTOR



Certificate of Achievement

HWMC

This certificate has been awarded to:

Desiree Hansen
at
Cedar Rapids, IA area

Session# 16765

For successful completion of Lion Technology's two-day RCRA Hazardous Waste Management Workshop. This training is designed for managers and supervisors of hazardous waste compliance activities at both large and small quantity generator sites [40 CFR 262.34(a)(4), 265.16, and 262.34(d)(5)(iii)].

Successful completion includes attaining a passing grade on the final proficiency test. The US EPA requires annual retraining for hazardous waste personnel working at large quantity generator sites and TSDFs [40 CFR 262.34(a)(4) and 265.16]. Training was conducted by Lion Technology Inc., 570 Lafayette Road, Sparta, NJ 07871 (973-383-0800).

*This training completed on: **September 16, 2016***

Lion Technology Member PIN: 7092230

1.4 CEUs, NEHA Authorized CE Contact Hours: 14

Attachment 2 Page 2 of 2

Noah Polsky
INSTRUCTOR



Certificate of Achievement

This certificate is awarded to:

Desiree Hansen

For successful completion of Lion Technology's Online Training Program:

Hazmat Ground Shipper Certification (DOT) Online Course

This training is designed to satisfy the general awareness, function-specific, and security awareness training requirements of 49 CFR 172.704(a) for typical managers and supervisors of hazardous materials transportation functions.

Successful completion includes attaining a passing grade on the final proficiency test. The US DOT requires training for hazmat employees no later than three years from the anniversary date of their previous training [49 CFR 172.704(c)(2)].

on

November 14, 2016

Training was conducted by Lion Technology Inc., 570 Lafayette Rd., Sparta, NJ 07871 (973-383-0800).

1.3 CEUs awarded
NEHA Authorized CE Contact Hours: 14

Jennifer M. Harris
Director, EHS Online Training



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TECHNOLOGY INC.
www.lion.com